

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, : 19-CR-286(AMD)

Plaintiff, :

-against- : United States Courthouse  
Brooklyn, New York

ROBERT SYLVESTER KELLY, :

Defendant. : September 13, 2021  
12:00 p.m.

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TRANSCRIPT OF TRIAL  
BEFORE THE HONORABLE ANN M. DONNELLY  
UNITED STATES DISTRICT JUDGE, and a jury.

APPEARANCES:

For the Government: JACQUELYN M. KASULIS, ESQ  
Acting United States Attorney  
BY: ELIZABETH GEDDES, ESQ.  
NADIA SHIHATA, ESQ.  
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Assistant United States Attorneys  
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Brooklyn, New York

For the Defendant: DEVEREAUX L. CANNICK, ESQ.  
NICOLE BLANK BECKER, ESQ.  
THOMAS FARINELLA, ESQ.  
CALVIN HAROLD SCHOLAR, ESQ.

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*Proceedings recorded by mechanical stenography, transcript  
produced by Computer-Aided Transcription*

Proceedings

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1 (In open court; outside the presence of the jury.)

2 THE COURTROOM DEPUTY: All rise.

3 (Defendant present.)

4 THE COURT: Just before we begin. Can I see the  
5 parties over at the side with the Court reporter?

6 (Sidebar held outside of the hearing of the jury.)

7 (Continued on next page.)

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Sidebar

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1 (The following sidebar took place outside the  
2 hearing of the jury.)

3 THE COURT: Apparently on Friday, what number  
4 alternate, Donna?

5 THE COURTROOM DEPUTY: I want to say 4. She was 5  
6 because we lost one. Alternate 4 said to Donna that she  
7 wanted to get Gloria Allred's autograph.

8 Of course, none of that would have happened if you  
9 hadn't alerted us to the fact that she was in the courtroom.

10 But I don't think this is anything. You can do an  
11 inquiry if you want. Let me hear what you each have to say  
12 about it.

13 MR. CANNICK: Firstly, I think it's not appropriate  
14 and, secondly, I would want an inquiry of her. We can do it  
15 at the end of the day. I would want that.

16 THE COURT: And the way that I will do it is we will  
17 have counsel, not the defendant, in the jury room and I will  
18 ask her about it. I think an inquiry is probably appropriate.  
19 I think it's extremely tangential. I think to be on the safe  
20 side I will do an extra reminder to everybody not to talk  
21 about the case. That's how we're going to go with it.

22 Anything else?

23 MS. GEDDES: I don't think so.

24 (Sidebar ends.)

25 (Continued on next page.)

Copeland - direct - Geddes

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1 THE COURT: Okay. Let's get the witness unless  
2 anybody has something to bring up.

3 Okay, let's get the witness.

4 (Witness takes the stand.)

5 (Jury enters.)

6 THE COURTROOM DEPUTY: You may be seated.

7 THE COURT: All right, everybody, welcome back. I  
8 hope everybody had a good weekend. We are ready to resume  
9 with, I don't remember where we were, direct?

10 MS. GEDDES: That's correct.

11 THE COURTROOM DEPUTY: The witness is reminded she  
12 is still under oath.

13 **DIANA COPELAND**, having been previously duly sworn/affirmed,  
14 testified as follows:

15 CONTINUED DIRECT EXAMINATION

16 BY MS. GEDDES:

17 Q Good morning.

18 A Good morning.

19 Q On Friday before we ended for the day, you testified  
20 about certain fines that the defendant imposed while you were  
21 working for him.

22 A Right.

23 Q Do you recall the amount of the fine that were imposed by  
24 the defendant?

25 A I do not.

Copeland - direct - Geddes

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1 Q Were they always the same amount or did it differ?

2 A It differed.

3 Q And were there times when you did not receive any part of  
4 your paycheck in a particular week as a result of a fine?

5 A Correct.

6 Q When we ended on Friday, you were testifying about a  
7 computer that you had purchased. Can you remind the jury when  
8 you purchased that computer?

9 A Somewhere around January 2018.

10 Q And what type of computer was it?

11 A It was a Macbook Air.

12 Q And what did you use the computer for in connection with  
13 your employment with the defendant?

14 A In connection with the employment, it would have been  
15 just to take notes in the meetings.

16 Q And I think you might have testified to this on Friday  
17 but it's been a while since then, what happened to the  
18 computer? When did you last see the computer?

19 A I last saw it in April 2018 in the lounge area of the  
20 studio.

21 Q And who was present when you last saw the computer?

22 A There were people there and Robert was there as well.

23 Q Did you have any conversations with the defendant about  
24 your computer?

25 A I did.

Copeland - direct - Geddes

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1 Q What happened during those conversations?

2 A Well, it wasn't exactly a conversation. I just asked him  
3 about it.

4 Q And when did you ask the defendant about your computer?

5 A When I first noticed it being missing.

6 Q That day at the studio in April of 2018?

7 A Correct.

8 Q And how did the defendant respond when you asked him  
9 about your computer going missing?

10 A He didn't really respond. He didn't know where it was.

11 Q What did he say?

12 A He was kind of -- he looked and didn't really know where  
13 it was.

14 Q What, if any, steps did the defendant take to try to  
15 locate your computer?

16 A None.

17 Q And what, if any -- did you hear the defendant ask anyone  
18 else in the room about what had happened to your computer?

19 A No.

20 Q Did you ever receive your computer back?

21 A No, I did not.

22 Q Did you take any steps to try to recover -- or find out  
23 where your computer was located?

24 A I did. I did a search on the computer -- on the -- on  
25 another computer. It was -- it's called, like, Find Your

Copeland - direct - Geddes

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1 Device and it located it.

2 Q And when did you do that -- when did you conduct that  
3 search?

4 A Just a little bit after I noticed that it was missing.

5 Q Was it that same day?

6 A Yes.

7 Q And based on that search where did it indicate your  
8 computer was?

9 A That it was still in the studio.

10 Q Did you subsequently learn that your computer had been  
11 used for something?

12 MR. CANNICK: Objection.

13 THE COURT: First of all, overruled.

14 Did you learn that; that your computer had been used  
15 even though you didn't have it?

16 THE WITNESS: Yes.

17 THE COURT: Next question.

18 BY MS. GEDDES:

19 Q What did you learn, what happened?

20 A The Apple sends you a notification if the computer is  
21 opened.

22 Q And approximately when did you -- is that what you mean  
23 that you received a notification from Apple that the computer  
24 had been opened?

25 A Correct.

Copeland - direct - Geddes

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1 Q And when did you receive that notification in connection  
2 or relative to when you last saw your computer at the studio?

3 A About a couple of months later.

4 Q What, if anything, did you do upon receiving that  
5 communication from Apple?

6 A I sent a text to his then-manager.

7 Q Who was his then-manager?

8 A James Mason.

9 Q And at the time that you received the notification from  
10 Apple that your computer had been opened, what if any  
11 information did you learn about its then-location?

12 A I'm sorry, can you repeat that?

13 Q Yes. When you received that notification from Apple that  
14 your computer had been opened, did you receive any information  
15 about the location of your computer at that time?

16 A I did not.

17 Q And just to be clear, I'm referring to the notification  
18 from Apple about where your computer was located?

19 A Initially, but I don't think the second time it indicated  
20 the location.

21 Q When you contacted contacted the manager that you just  
22 referenced, James Mason, whose manager was that?

23 A Robert's.

24 Q The defendant's?

25 A Correct.



Copeland - direct - Geddes

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1 Q And you testified earlier or last week, that you stopped  
2 working for the defendant in approximately April of 2018; is  
3 that correct?

4 A Correct.

5 Q And was that the same month that your computer went  
6 missing?

7 A Correct.

8 Q Why did you stop working for the defendant at that time?

9 A A number of reasons.

10 Q Was one of them --

11 THE COURT: Well let's --

12 What were the reasons?

13 THE WITNESS: Well, there was a lot going on. Wow.  
14 It was just we weren't seeing eye-to-eye. There was, you  
15 know, new management. I kind of felt like things should have  
16 been handled differently because we had had people in that we  
17 didn't trust and so we weren't seeing eye-to-eye in terms of  
18 that.

19 BY MS. GEDDES:

20 Q In terms of "we" who are you referring to?

21 A Myself and Robert.

22 Q Now did you see the defendant after you stopped working  
23 for him?

24 A I did, yes.

25 Q When was the last time that you saw the defendant prior

Copeland - direct - Geddes

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1 to the beginning of your testimony last week?

2 A The last time?

3 Q That you saw him.

4 A That would have been probably in 2019.

5 Q And do you recall during what part of 2019 you last saw  
6 the defendant?

7 A I can't recall.

8 Q Okay. Where did you first see the defendant on that last  
9 occasion when you saw him?

10 A Well, we met at a park.

11 Q Where was the park located?

12 A Across from the water tower.

13 Q Is that in Chicago?

14 A Yes.

15 Q And what happened when you showed up at the park?

16 A When I showed up at the park, he was -- I was sitting on  
17 the bench. He called me and he said, Don't you see this big  
18 giant van sitting here jokingly. And so I eventually went to  
19 the van. We ended up going to the Trump Towers from there.

20 Q And just to be clear, for the record when you say "he,"  
21 are you referring to the defendant?

22 A Yes.

23 Q Who went to the Trump Towers that day?

24 A I believe it was Robert, \*Jane and myself.

25 Q And what happened when you arrived at the Trump Towers?

Copeland - direct - Geddes

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1 A When I arrived at the Trump Towers, Jane gave me a robe  
2 to put on.

3 Q What, if anything, did she say?

4 A She said that Mr. Kelly would like me to -- she asked me  
5 was I wired.

6 Q What did you understand her to mean when she asked you if  
7 you were wired?

8 A If I had some kind of device that would record or --

9 Q Now, at the time that you last saw the defendant and went  
10 to the Trump Towers, had you met with law enforcement at that  
11 time?

12 A I'm not sure if that was before or after.

13 Q How did you respond when Jane asked you whether you were  
14 wired?

15 A I was shocked and I said no.

16 Q What, if anything, did you do with the robe that Jane  
17 provided to you?

18 A Well, I took off my sweatshirt and I left on my tank top  
19 and my pants and I put the robe on.

20 Q And who did you understand wanted you to be putting on  
21 that robe?

22 A Robert.

23 Q And what did you understand the defendant wanted you to  
24 have other than the robe on? What was the purpose --

25 What did you understand was the purpose of having

Copeland - direct - Geddes

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1 been provided with this robe?

2 A To disrobe and to put the robe on.

3 Q For what reason?

4 A To make sure I wasn't wired.

5 Q And just to be clear, were you wearing a wire?

6 A No.

7 Q Or did you have a recording device at any point?

8 A Absolutely not.

9 Q After you put on the robe and advised Jane that you were  
10 not -- did not have a wire on, did you interact with the  
11 defendant?

12 A I did.

13 Q What happened when you saw the defendant?

14 A He was very upset at what was going on in the media.

15 Q What, if anything, did he ask you to do?

16 A At a certain point he just told me to write something  
17 truthful about how I feel about him.

18 Q And what, if anything, did he provide you in order to do  
19 that?

20 A I think it was a notebook and pen.

21 Q And did you then write a letter?

22 A I did.

23 MS. GEDDES: I'm showing the witness only what's  
24 been marked for identification as Government Exhibit 301.

25 THE COURT: Any objection to this going into

Copeland - direct - Geddes

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1 evidence?

2 MR. CANNICK: None.

3 THE COURT: Okay. This will be in evidence as 301?

4 MS. GEDDES: Yes.

5 THE COURT: Admitted.

6 (Government Exhibit 301 received in evidence.)

7 BY MS. GEDDES:

8 Q Do you recognize what's shown in 301?

9 (Exhibit published.)

10 A Yes.

11 Q What is that?

12 A This is my handwriting and this is the letter.

13 Q And I want to -- you testified earlier that the defendant  
14 asked you to write a letter that was truthful; is that  
15 correct?

16 A That is correct.

17 Q Have you had an opportunity to review this letter prior  
18 to your testimony today?

19 A Yes, I have.

20 Q And having reviewed the letter, was everything that you  
21 wrote in this letter truthful?

22 A Everything, yes.

23 Q I want to direct your attention to the second page where  
24 it indicates, he has never verbally, physically or mentally  
25 abused anybody.

Copeland - direct - Geddes

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1           Based on what -- having worked for the defendant for  
2 the lengthy period of time that you worked for him, was that  
3 an accurate statement when you wrote that?

4 A     It probably should say I have never seen him verbally,  
5 physically or mentally abuse anyone.

6 Q     Well, during the course of your employment with the  
7 defendant, was there ever a time when the defendant verbally  
8 abused you?

9 A     I don't know that I would call it verbally abuse --  
10 verbal abuse.

11 Q     Did you and the defendant get into verbal altercations?

12 A     Yes.

13 Q     And what were the nature of those altercations?

14 A     Usually it would be over a fine.

15 Q     And what was the defendant's demeanor during some of  
16 these discussions?

17 A     He could get pretty heated, yes.

18 Q     Could you describe what you mean by him getting pretty  
19 heated?

20 A     He could get angry. He could curse. He could -- yeah.

21 Q     And what, if anything, would you do after you had some of  
22 those verbal disputes with the defendant?

23 A     Sometimes cry.

24 Q     And did you always continue to work for the defendant  
25 after those verbal disputes?

Copeland - direct - Geddes

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1 A Yes. Well, sometimes I would leave.

2 Q And when you say sometimes you would leave, what do you  
3 mean?

4 A It means sometimes I would quit.

5 Q As a result of those verbal disputes?

6 A Correct.

7 Q Would the defendant raise his voice during some of those  
8 disputes?

9 A Correct.

10 Q And would the defendant criticize you during some of  
11 those disputes?

12 A Correct.

13 Q Now, you testified that you wrote this letter shown in  
14 Government Exhibit 301 in 2019 at some time.

15 Was that the only time that you wrote a letter at  
16 the defendant's direction?

17 A No.

18 Q When if -- what other time had the defendant asked you to  
19 write a letter?

20 A Years ago initially, I think the staff wrote letters  
21 basically saying that they stole something and this was just  
22 to make sure that no one was going to do something against  
23 him.

24 Q What did the defendant ask you to do?

25 A Write a letter.

Copeland - direct - Geddes

3199

1 Q Did the defendant explain why he wanted you to write a  
2 letter?

3 A Yeah, I believe his attorneys had told him to have us do  
4 that.

5 Q And what did you understand the defendant wanted you to  
6 write in the letter that he asked you to write?

7 A That I stole something.

8 Q At the time that you wrote the letter had you, in fact,  
9 stolen anything from the defendant?

10 A No.

11 MS. GEDDES: I am showing the witness what's been  
12 marked for identification as Plaintiff's Exhibit 3500-DC2-8.

13 THE COURT: Any objection to this Mr. Cannick?

14 MR. CANNICK: No.

15 MS. GEDDES: The Government Plaintiff's Exhibit  
16 3500-DC2-8.

17 THE COURT: It's in evidence.

18 (Government Exhibit 3500-DC2-8 received in  
19 evidence.)

20 (Exhibit published.)

21 BY MS. GEDDES:

22 Q Do you recognize the letter that is in Plaintiff's  
23 Exhibit 3500-DC2-8?

24 A Yes.

25 Q And at the top whose signature is that?



Copeland - direct - Geddes

3200

1 A Mine.

2 Q And it reads: This is the hardest letter that I have  
3 ever written. I wanted to write it in the most honest and  
4 humble way possible, but there is no perfect or easy way to  
5 tell someone you love that you have betrayed them. I have  
6 stolen money from you and I am very sorry. It took me two  
7 years to admit it to myself and to you because I would rather  
8 leave than have you look at me differently. I am so thankful  
9 that you are a forgiving person. We have always been like  
10 family and I would not be the same if I lost our relationship  
11 over this. I will never, ever betray in any way ever again.  
12 I am truly disappointed in myself and I am ashamed. There is  
13 no pain greater than the one in my heart right now. There is  
14 no excuse for what I did and no way to make it look better.

15 I took something from you that didn't belong to me.  
16 I stole money. What makes it worse is that I know in my heart  
17 that if I had asked you for some money, you would have no  
18 problem with it. You are a very giving and loving person and  
19 there is no excuse for anyone you love to steal from you.  
20 Right now I don't feel deserving of your love or your trust  
21 and it's killing me inside. It's the very feeling that I ran  
22 away from for two years, but right now all I can do is  
23 apologize and hope time heals the pain, trust and our  
24 friendship. Please feel my spirit when I say that I am truly  
25 sorry and I will never betray you ever again. I love you.

SN

OCR

RPR

Copeland - direct - Geddes

3201

1           And then there are two signatures there. Are those  
2 both your signature as well?

3     A     Yes.

4     Q     And at the top of this -- of this third page, is that  
5 also your signature there at the top right-hand corner?

6     A     Yes.

7     Q     And at the top of the second page, there is also a  
8 signature, is that also your signature?

9     A     Yes.

10    Q     And just to be clear, did you ever steal anything from  
11 the defendant?

12    A     No.

13    Q     I am showing the witness only what's been marked for  
14 identification as Government Exhibit 970?

15           (Exhibit published for witness only.)

16    BY MS. GEDDES:

17    Q     Do you recognize what's shown in Exhibit 970?

18    A     Yes.

19    Q     What that?

20    A     My phone number.

21    Q     Is it still your phone number today?

22    A     Yes, it is.

23    Q     How long have you used that phone number?

24    A     For many years. I don't know how many.

25    Q     And did you use that telephone number while you were

Copeland - direct - Geddes

3202

1 working with the defendant?

2 A Yes.

3 MS. GEDDES: The Government offers 970.

4 MR. CANNICK: No objection.

5 THE COURT: That is in evidence.

6 (Government Exhibit 970 received in evidence.)

7 THE COURT: Jury only?

8 MS. GEDDES: Jury only, please.

9 (Exhibit published to jury only.)

10 MS. GEDDES: Nothing further.

11 THE COURT: Cross-examination?

12 MR. CANNICK: Yes, Your Honor, thank you.

13 CROSS-EXAMINATION

14 BY MR. CANNICK:

15 Q I just want to go over your testimony a bit here. The  
16 letter that was just read to you by the Government, DC-8, in  
17 that letter you said that Rob is a giving and loving person.  
18 Did you find that to be true?

19 A Yes, I did.

20 Q Did you find him to be a generous person?

21 A Yes.

22 Q And you testified that that letter did not pertain to you  
23 actually stealing anything from him. There was a reference  
24 that you stole something from him but that was not true;  
25 correct?

Copeland - direct - Geddes

3203

1 A Correct.

2 Q But what was true was that there was a dispute that you  
3 and he had about something that was a misunderstanding; am I  
4 correct?

5 A Yes.

6 Q And that misunderstanding caused you to decide, you know  
7 what, given the misunderstanding I'm going to leave and you  
8 wrote that letter on your way back to work with him, am I  
9 correct?

10 A That is correct.

11 Q You left him for two years after that and on coming back,  
12 you wrote that letter?

13 A That's correct.

14 Q And the misunderstanding was never resolved, right, you  
15 just moved on from it?

16 A That is correct.

17 Q Now, the Government asked you about whether or not Robert  
18 had ever verbally abused, do you remember them asking you  
19 that?

20 A Yes.

21 Q And you testified that there were times that you and he  
22 would have disagreements and sometimes you would cry, am I  
23 correct?

24 A Right.

25 Q You met with the Government before coming her to give

Copeland - direct - Geddes

3204

1 your testimony here?

2 A Yes.

3 Q And you met with them a number of times, am I correct?

4 A That's correct.

5 Q And during the preparation to come here, they asked you  
6 questions, am I correct?

7 A That is correct.

8 Q And during their asking you those questions, you cried  
9 then; am I correct?

10 A That is correct.

11 Q They didn't like how you were answering the questions and  
12 you eventually cried; am I correct?

13 MS. GEDDES: Objection.

14 THE COURT: Sustained.

15 BY MR. CANNICK:

16 Q But you cried?

17 A Yes, I did.

18 Q Now, you mentioned that there were times that Rob would  
19 exact fines on you and his other employees; am I correct?

20 A That is correct.

21 Q Now, fines in the music industry is pretty commonplace;  
22 am I correct?

23 MS. GEDDES: Objection.

24 THE COURT: Do you have any basis for having an  
25 opinion about whether fines are common in the music industry?

Copeland - direct - Geddes

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1 THE WITNESS: I do, Your Honor.

2 THE COURT: What is the basis for your --

3 THE WITNESS: I have friends that are in the  
4 industry.

5 THE COURT: Well, I guess the jury can take the  
6 answer for what it is worth.

7 Go ahead.

8 BY MR. CANNICK:

9 Q And your friends in the industry, you find that they were  
10 fined by their bosses; is that correct?

11 A That is correct.

12 Q And I'm sure being in the industry for the amount of time  
13 you have been in there, you heard about how James Brown used  
14 to fine --

15 MS. GEDDES: Objection.

16 THE COURT: Sustained.

17 BY MR. CANNICK:

18 Q Now, you testified that there was a time that you left  
19 your employment with Robert because you guys weren't seeing  
20 eye-to-eye. Do you remember that?

21 A Right.

22 Q Now, that was only because of business direction, am I  
23 correct?

24 A That is correct.

25 Q In fact, there was new management and you weren't in

Copeland - direct - Geddes

3206

1 synch with the new management; am I correct?

2 A Correct.

3 Q Now during your final stint -- withdrawn.

4 Do you recall how many times you left your  
5 employment with Robert and returning?

6 A Many.

7 Q Many; right?

8 A Yes.

9 Q And you would come back because you found it to be an  
10 exciting job?

11 A I came back sometimes because I felt he didn't have  
12 trustworthy people around him.

13 Q And when you say that, you knew that some of his  
14 employees had stolen from him; am I correct?

15 MS. GEDDES: Objection.

16 THE COURT: Sustained.

17 BY MR. CANNICK:

18 Q Well, wasn't your responsibility when you came back in  
19 the final months of your job was to help him find his monies?

20 A Yes.

21 Q Okay. Because there were large sums of monies that just  
22 disappeared?

23 MS. GEDDES: Objection.

24 THE COURT: Sustained as to form.

25 BY MR. CANNICK:

Copeland - direct - Geddes

3207

1 Q Why did you have that responsibility?

2 A Robert did not have any control over his bank account.  
3 He didn't even know even know his Social Security number. He  
4 had no control over over whether things were being paid, the  
5 urgent things that needed to be paid. He had no control over  
6 that and he had no idea where his royalties were going. Who  
7 was getting that check and so that was a huge problem.

8 Q Okay, thank you. Given your employment with Mr. Kelly  
9 you came to understand that he had a problem with reading and  
10 writing?

11 A Correct.

12 Q Now, I want to go back and discuss some aspects of your  
13 employment with Mr. Kelly. You were employed with him at a  
14 point in time as his executive assistant?

15 A Correct.

16 Q What was your responsibilities as his executive  
17 assistant?

18 A The focus was to make sure that he had everything  
19 required to make music, to tour, to live comfortably, to make  
20 sure that the bills were paid, that his home was running  
21 smoothly, that his kids were taken care of.

22 Q And you were pretty much his go-to person in terms of  
23 making sure that those things were to his standard?

24 A Correct.

25 Q Now, you also testified that you worked as his assistant.



Copeland - direct - Geddes

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1 Was that a personal assistant?

2 A Correct.

3 Q And what were the responsibilities -- what were your  
4 responsibilities as his personal assistant?

5 A So, at that time it was more so to manage the estate when  
6 he was living in Olympia Fields. The children were there at  
7 the time and there were nannies and housekeepers and people  
8 who took care of the grounds and things of that nature that  
9 needed to be scheduled and paid.

10 Q And did you have any direct involvement with his children  
11 and wife?

12 A Yes.

13 Q What were those involvements?

14 A That was another part of making sure that the household  
15 ran smoothly. You know, I was told when I first was hired  
16 that I was an extension of him because he was really busy.  
17 And he would be in the studio for hours so I had to make sure  
18 that the kids had something to do. He would have me schedule  
19 trips to the museum and things like that with their teacher  
20 and things of that nature.

21 Q Now you mentioned that he was a very busy person. Could  
22 you give us an idea as to his daily routine?

23 A That varied every day. He would be in the studio from  
24 nighttime until the sun came up many days.

25 Q Let me stop you there. In terms of being in the studio

Copeland - direct - Geddes

3209

1 did he have an engineer staff with him?

2 A At what period?

3 Q At the time that you worked with him --

4 A Actually he had engineers the entire time I was working  
5 there.

6 Q Do you know the shifts of those engineers?

7 A I do not know their shifts.

8 Q Okay. But do you recall them working pretty much 24  
9 hours a day?

10 A 24 hours, yeah. There was always somebody there, but --

11 Q And they would be there because oftentimes he would have  
12 an inspiration or decide to go to the studio and he would  
13 either work -- need to work on his music; am I correct?

14 A Correct.

15 THE COURT: I do not see the relevance, but let's  
16 move on to something else.

17 BY MR. CANNICK:

18 Q Now his band was there 24 hours?

19 THE COURT: His band?

20 MR. CANNICK: His band.

21 THE COURT: I really don't see the relevance.

22 MR. CANNICK: Your Honor --

23 THE COURT: Go ahead.

24 BY MR. CANNICK:

25 Q His band would be there to be ready to perform if he was

Copeland - direct - Geddes

3210

1 deciding to go to the studio; right?

2 A Sometimes, yes.

3 Q And did he play basketball during his daily routine?

4 A Yes.

5 Q Do you know what his his basketball schedule?

6 A Typically he would play somewhere around 11 p.m. or  
7 midnight.

8 Q So he would play in the -- closer to midnight for about  
9 how many hours?

10 A Maybe three.

11 Q And then after that would he go back to the studio, to  
12 your knowledge?

13 A Yes.

14 Q And when would he get to bed?

15 MS. GEDDES: Objection.

16 A Morning.

17 THE COURT: Was this every day?

18 THE WITNESS: It was a routine.

19 THE COURT: Okay.

20 BY MR. CANNICK:

21 Q Did he have any involvement during his daily routine with  
22 other artists? Did he work with other artists?

23 A Absolutely.

24 Q Other producers?

25 A Yes.

Copeland - direct - Geddes

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1 Q Record label?

2 A Yes.

3 Q Did he during his day have to plan concerts and tours?

4 A That is correct.

5 Q And do you know whether or not he would write music for  
6 himself and for other artists?

7 A Yes, he did.

8 Q And these artists that he would write and produce for,  
9 they were considered A-list musicians?

10 MS. GEDDES: Objection.

11 THE COURT: I think we're going quite far afield  
12 here. Let's move on to something else.

13 BY MR. CANNICK:

14 Q What time would he begin his day?

15 A Somewhere around maybe 4 p.m., 5 p.m.

16 Q And you had total access of the properties that you  
17 worked for when you worked with Mr. Kelly?

18 A Yes.

19 Q And what properties were they?

20 A Olympia Fields, the Trump Towers, the estate in John's  
21 Creek.

22 Q And of all of those properties, did you note that any of  
23 the bedrooms or rooms had locks on the outside of the door?

24 A No, they did not.

25 Q Do you know whether or not any of his phones were ever

Copeland - direct - Geddes

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1 rigged so that they could only call certain numbers?

2 THE COURT: Any of his personal telephone?

3 MR. CANNICK: The phones within the studio and in  
4 the home.

5 THE COURT: Like a landline?

6 MR. CANNICK: Yes.

7 THE COURT: Okay.

8 A No.

9 Q Have you ever heard that?

10 A I have not heard of that.

11 Q Now, did you have responsibility as relates to  
12 Mr. Kelly's guests?

13 A Yes.

14 Q And what type of guests would he have?

15 A It could range from record label executives, you know,  
16 A-list stars like Whitney Houston, God bless her soul.

17 Q What about his personal friends?

18 A People he played basketball with or female friends.

19 Q The female friends, some of them you learned that they  
20 were his girlfriends; am I correct?

21 A That is correct.

22 Q And some of those girlfriends lived with him; am I  
23 correct?

24 A That is correct.

25 Q Now, when you mentioned that you have involvement with

Copeland - direct - Geddes

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1 his record label and other entertainers, would those  
2 individuals bring their entourage with them when they would  
3 visit?

4 A Sometimes.

5 Q Now, does Robert have certain policies or procedures to  
6 maintain decorum in his home and his business?

7 A Yes.

8 Q What were they?

9 A The decorum in the home was that you could not roam his  
10 home. You could not -- you should knock if you come out of  
11 one room and you go into another. Those were the biggest  
12 rules.

13 Q And his wife was the one who put --

14 MS. GEDDES: Objection.

15 THE COURT: Overruled.

16 BY MR. CANNICK:

17 Q His wife was the one who put the rules in place about  
18 knocking on doors in the home and the business; am I correct?

19 A That is correct.

20 Q Now, this rule applied to everyone who came into his  
21 home; am I correct?

22 A That is correct.

23 Q It wasn't just a rule for girlfriends; am I correct?

24 A No, it wasn't just -- it was for everybody.

25 Q Now, I asked you earlier if you ever -- if you had

Copeland - direct - Geddes

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1 meetings with the Government. Do you remember me asking you  
2 that?

3 A Yes.

4 Q Now, when you went to visit the Government for these  
5 sessions, you couldn't just roll out of the house; correct?

6 A No.

7 Q A marshal had to escort you; correct?

8 A That is correct.

9 Q You couldn't just get up and go to the bathroom; correct?

10 MS. GEDDES: Objection.

11 THE COURT: Overruled.

12 Did someone have to walk you to the bathroom?

13 THE WITNESS: Yes.

14 THE COURT: Inside?

15 THE WITNESS: Yes.

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17 (Continued on the following page.)

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Copeland - Cross - Cannick

3215

1 CROSS-EXAMINATION (CONTINUED)

2 BY MR. CANNICK:

3 Q And if you wanted to go get some lunch, they had to  
4 walk you out; am I correct?

5 A I wasn't allowed.

6 Q You weren't allowed lunch?

7 A I wasn't allowed to go for lunch. I'm sorry.

8 Q Okay. Now, I asked you about Mr. Kelly having live-in  
9 girlfriends. Did those live-in girlfriends lived there for  
10 substantial periods; am I correct?

11 A Yes.

12 Q Okay. Some lived there three, four, five years and  
13 beyond; am I correct?

14 A Correct.

15 Q And some of them came and went; am I correct?

16 A That is correct.

17 Q In fact -- what's the name -- Anna was one who came and  
18 left; am I correct?

19 A Oh, yes.

20 Q Many times, am I correct?

21 A That's correct.

22 Q And she also had an apartment in Atlanta; am I correct?

23 A That is correct.

24 Q And Robert paid for that apartment; am I correct?

25 A I'm not aware who paid for it.



Copeland - Cross - Cannick

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1 Q Okay. But you know she came and left?

2 A Yes.

3 Q And do you know someone that they called "Juice"?

4 A I do.

5 Q Now, "Juice" stayed for long periods of time; am I  
6 correct?

7 A That's correct.

8 Q But she also left, as well; am I correct?

9 A That's correct.

10 Q Came and left, right?

11 A Yes, sure.

12 Q She also had a car?

13 A Yes.

14 Q And she had a job?

15 A She did.

16 Q And what about someone by the name of Dominique, that  
17 person stayed for a period of time?

18 A That is correct.

19 Q And then left; am I correct?

20 A That's correct.

21 Q And others did, Sara?

22 A Yeah.

23 Q Okay.

24 A I remember Sara, yeah.

25 Q She never stayed in-house; am I correct?

Copeland - Cross - Cannick

3217

1 A No, she never stayed.

2 Q She stayed in a hotel?

3 A Yes, that's correct.

4 Q And she'd come and go; am I correct?

5 A Yes.

6 Q And there were a number of individuals who were of that  
7 status of coming and leaving; am I correct?

8 A That's correct.

9 Q Now, you testified about taking Mr. Kelly's girlfriend  
10 shopping. That was part of your responsibility; am I  
11 correct?

12 A I don't know if it was a responsibility, but it was  
13 part of what I did.

14 Q Part of what you did?

15 A Yeah.

16 Q And Mr. Kelly would splurge on these on these young  
17 ladies; am I correct?

18 A Yes.

19 Q He would have you -- have them go to high-end stores?

20 A That's correct.

21 Q He would pay for their cosmetic procedures?

22 A That's correct.

23 Q He would lavish them with gifts?

24 A Correct.

25 Q Parties?

Copeland - Cross - Cannick

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1 A Correct.

2 Q Picnics?

3 A Correct.

4 Q Rental getaways?

5 A Correct.

6 THE COURT: What did -- I didn't hear what you  
7 said.

8 Q Rental getaway, a house in the mountains?

9 THE COURT: I see.

10 A That is correct.

11 Q Exotic pets?

12 A That's correct.

13 Q Extravagant parties?

14 A That is correct.

15 Q Trips abroad?

16 A That's correct.

17 Q He afforded them an exotic lifestyle, did he not?

18 A Yes.

19 Q Now, Mr. Kelly, you mentioned that he -- his  
20 girlfriends would call his daddy. Do you remember telling  
21 us that?

22 A That's correct.

23 Q Now daddy is a term of endearment; am I correct?

24 THE COURT: Sustained.

25 Q I have something to say and I don't remember -- I

Copeland - Cross - Cannick

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1 don't.

2 THE COURT: I said sustained.

3 MR. CANNICK: Sustained.

4 THE COURT: Yes.

5 Q Have you ever heard --

6 THE COURT: I'm going sustain this, too, I think,  
7 beginning, have you ever heard.

8 MR. CANNICK: No, no, not have you ever heard.

9 Your Honor, I think we need a sidebar.

10 (Continued on the next page.)

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Sidebar Conference

3220

1 (The following occurred at sidebar.)

2 MR. CANNICK: Your Honor --

3 THE COURT: Her opinion, how can you defend --

4 MR. CANNICK: How can I defend -- if the  
5 Government's saying that he made her call him daddy, right,  
6 I think that I have a right to show how the context was  
7 used.

8 THE COURT: First, the Government didn't say --  
9 and don't you think, that haven't you ever heard that using  
10 daddy in this way is whatever supports their opinion?  
11 That's all. I'm not letting you do -- you can certainly  
12 argue that --

13 MR. CANNICK: Yeah, I will.

14 THE COURT: But this lady's opinion --

15 MR. CANNICK: Okay.

16 THE COURT: -- about when people called them daddy  
17 is not really relevant.

18 Do you know how much longer you have with her?

19 MR. CANNICK: Maybe 30 or 40 minutes.

20 THE COURT: Okay.

21 MR. CANNICK: I'm going a lot faster than I  
22 thought.

23 THE COURT: The only thing I was thinking about  
24 was, right after in the next break, I would like to just  
25 follow-up with that juror, with the alternate juror.

Sidebar Conference

3221

1 MR. CANNICK: Sure, okay.

2 THE COURT: All right? Because we're going until  
3 6:00 tonight.

4 MR. CANNICK: Right.

5 THE COURT: So I think what we'll do is maybe if  
6 anybody needs five minutes.

7 MR. CANNICK: Okay.

8 THE COURT: And then we're going to convene. I'll  
9 have Donna work out the details.

10 MR. CANNICK: Okay. We're going to take a break  
11 now?

12 THE COURT: No, no, no.

13 MR. CANNICK: Oh, okay.

14 THE COURT: That's why I wanted to figure out when  
15 you're done.

16 MR. CANNICK: Okay.

17 THE COURT: And then we'll do it in Judge Chen's  
18 jury room.

19 MR. CANNICK: Do you have a set time in mind when  
20 you want to take it?

21 THE COURT: I'm think around 2:00ish.

22 MR. CANNICK: 2:00ish? Okay.

23 THE COURT: Yes. That's 45 minutes.

24 If you're not done, that's also fine.

25 MR. CANNICK: Yeah, okay.

Sidebar Conference

3222

(Continued on the next page.)

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Copeland - Cross - Cannick

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1 (Sidebar ends; in open court.)

2 THE COURT: All right. Go ahead.

3 Q Now, are you familiar with the lyrics of Mr. Kelly's  
4 songs?

5 MS. GEDDES: Objection.

6 THE COURT: If you can answer the question.

7 Do you know the words to his song?

8 Q Well, let me be specific. To Chocolate Factory?

9 MS. GEDDES: Objection.

10 THE COURT: A few questions.

11 MR. CANNICK: Okay.

12 THE COURT: I don't really think this is --

13 Q In this song he called himself daddy; am I correct?

14 MS. GEDDES: Objection.

15 THE COURT: Overruled. She doesn't -- do you know  
16 the words?

17 THE WITNESS: To be totally honest.

18 THE COURT: Let's move on to something else.

19 MR. CANNICK: I will see if I can refresh her  
20 recollection.

21 THE COURT: No, no, no, no, no. Next question.

22 Q Well, in that song did he say --

23 MR. CANNICK: I know I'm slow, Your Honor, but --

24 THE COURT: Mr. Cannick, it does not matter what  
25 the lyrics of his song were, that's all I'm saying. Let's



Copeland - Cross - Cannick

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1 put some other questions to the witness. She said she's not  
2 familiar with the lyrics.

3 MR. CANNICK: That's why I was trying to refresh  
4 her recollection, Your Honor.

5 THE COURT: The objection is sustained.

6 MR. CANNICK: Thank you.

7 Q Be you do know that he had a song called Chocolate  
8 Factory?

9 A I've heard that, yes.

10 Q But you don't recall the lyrics of the song?

11 A I don't.

12 Q And you don't recall whether or not he called himself  
13 daddy in that song?

14 A I don't know.

15 Q Now, Mr. Kelly, you mentioned earlier that -- in your  
16 testimony that when he would come into the room -- I'm not  
17 sure if this was your testimony or not -- but when he came  
18 into the room his girlfriends kiss him?

19 A They did, yes.

20 Q Okay. But when his girlfriends came into the room he  
21 stood up; am I correct?

22 A That's correct.

23 Q In fact, when you came into the room he stood up; am I  
24 correct?

25 A That's correct.

Copeland - Cross - Cannick

3225

1 Q And, in fact, he would stand up anytime a female came  
2 into the room; am I correct?

3 A That's correct.

4 Q And he would open the door for any female; am I  
5 correct?

6 A That's correct.

7 Q It wasn't just his girlfriends; am I correct?

8 A That's correct.

9 Q Now, and he hired personal assistants to make sure that  
10 the needs and the wants of his girlfriends were attended to;  
11 am I correct?

12 A That is correct.

13 Q And the rules that -- the policies that we spoke about  
14 earlier, knocking and to make sure that before you, leaving  
15 and going into a room, that applied to staff as well as  
16 girlfriends?

17 MS. GEDDES: Objection.

18 A Overruled.

19 Q Now, have you ever been or have you ever traveled on  
20 the tour bus?

21 A I have, yes.

22 Q Now, was there a rule in place as it relates to  
23 knocking on a door before coming out of the bathroom?

24 A Oh, yes.

25 Q And why was that such a rule?

Copeland - Cross - Cannick

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1 A Well, the door was directly across from the microwave.  
2 And so should you be warming something up or boiling water  
3 for tea or coffee you could get pretty burned.

4 Q Okay.

5 A So...

6 Q If you came out without letting folks know that you're  
7 coming out by opening the door?

8 A Yes.

9 Q Now that rule applied to everyone; am I correct?

10 A Oh, yes.

11 Q It just didn't apply to Jane, do you know who Jane is?

12 A I do.

13 Q That rule just didn't apply to Jane, did it?

14 A Oh, no.

15 Q It applied to everybody?

16 A Me included.

17 Q Okay. Now, you would take the tour bus and the  
18 Sprinter sometimes on cross-country trips; am I correct?

19 A That's correct.

20 Q And these weren't pleasure trips, these are trips where  
21 Mr. Kelly was going to perform; am I correct?

22 A That's correct.

23 Q And sometimes you would be out in the middle of  
24 nowhere; am I correct?

25 A Correct.

Copeland - Cross - Cannick

3227

1 Q There would be no bathrooms in sight for miles; am I  
2 correct?

3 A That's correct.

4 Q And, in fact, there would be no cell phone service  
5 because you're so far out; is that correct?

6 A That is correct.

7 Q And there was a time when you didn't have rest room  
8 coming up anytime soon, some people would urinate in large  
9 cups; am I correct?

10 A I'm not aware of that.

11 Q You're not aware of the big gulp cups?

12 A I -- I know about it, but I -- at the time, I didn't  
13 know people were doing that.

14 Q Oh, you didn't know people were doing that?

15 A No.

16 Q Okay.

17 All right. Now, have you ever rented a car with  
18 one of Mr. Kelly's runners driving you from Point A to Point  
19 B?

20 A Can you repeat the question.

21 Q Mr. Kelly had runners; am I correct?

22 A Yes, that's correct.

23 Q And these runners would do whatever task that he would  
24 want or what the staff would ask him; am I correct?

25 A That's correct.

Copeland - Cross - Cannick

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1 Q And sometimes it required them driving you someplace;  
2 am I correct?

3 A That's correct.

4 Q And have you ever ridden with one of them?

5 A Yes.

6 Q And they would flip the mirror up; am I correct?

7 A Yes.

8 Q And you would want that; am I correct?

9 MS. GEDDES: Objection.

10 THE COURT: She would want the mirror up?

11 MR. CANNICK: She would want the mirror up.

12 THE COURT: Did you want the mirror up?

13 THE WITNESS: I didn't necessarily want it, but it  
14 was okay.

15 Q Did you find it to be offensive?

16 A No.

17 Q What was the benefit?

18 MS. GEDDES: Objection.

19 THE COURT: Overruled.

20 A Well, just not having to have conversation or --

21 Q So --

22 A -- to have eye contact with someone.

23 Q So you appreciated the fact that you didn't have to  
24 have conversation or eye contact with the driver?

25 A That's correct.

Copeland - Cross - Cannick

3229

1 Q Okay. Now, there were occasions when you told us that  
2 you escorted Mr. Kelly's girlfriends on shopping trips. Do  
3 you remember telling us that?

4 A That's correct.

5 Q And they would wear sweat clothes; am I correct?

6 A That's correct.

7 Q You would wear sweat clothes, too; am I correct?

8 A That's correct.

9 Q And they would be warmup suits and you did it for the  
10 comfort; am I correct?

11 A Oh, yeah.

12 Q And there were times that you would escort them to rest  
13 rooms?

14 A That's correct.

15 Q Okay. Why would you escort them the rest room?

16 A It would only be when we are at a venue that we weren't  
17 familiar with. One of the first things that my job required  
18 was for me to find a bathroom, the rest rooms, were -- for  
19 guests or even for him.

20 Q So the first thing that you would do is find the  
21 location of those rest rooms?

22 A That's correct.

23 Q And because you knew the location you would escort the  
24 guests?

25 A That is correct.

Copeland - Cross - Cannick

3230

1 Q And, in fact, you would escort Mr. Kelly as well; am I  
2 correct?

3 A That is correct.

4 Q Now, have you ever gone in the stall with them --  
5 withdrawn.

6 Have you stood right outside of the stall with  
7 them and -- with them being a girlfriend when they were  
8 using the facility?

9 A No.

10 Q And lets be more specific. Have you ever stood outside  
11 the stall -- do you know someone by the fame of Faith?

12 A I do.

13 Q Okay. Did you ever stand outside the stall when she  
14 was using the facility?

15 A No. I escorted her one time and the bathroom did not  
16 have a stall, it was one individual bathroom.

17 Q Okay. And where did you position yourself?

18 A Outside the door of the rest room.

19 Q Now, did you ever give her, serve her alcohol?

20 A No.

21 Q You're smiling. Why are you smiling?

22 A Because I don't drink and I would be the last person  
23 that somebody would ask for that.

24 Q Now, you testified and told us yesterday about  
25 escorting Mr. Kelly's girlfriends shopping and you would

Copeland - Cross - Cannick

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1 interact with the salespeople?

2 A Correct.

3 Q Well, you would interact with salespeople -- well,  
4 withdrawn.

5 You would go sopping with Mr. Kelly from time to  
6 time; am I correct?

7 A Yes, that's correct.

8 Q And you would interact with the salespeople for him; am  
9 I correct?

10 A That is correct.

11 Q Now when you were honing your duties as personal  
12 assistant and executive assistant, Mr. Kelly's female guests  
13 were not free to move around his business at home?

14 A That's correct.

15 Q But none of his guests were; am I correct?

16 A That's correct.

17 Q Now when you met with the Government, your attorney  
18 with was you; am I correct?

19 A That's correct.

20 Q Ms. Rodriguez?

21 A Yes.

22 Q And she is here with you this mornings?

23 A Yes, she is.

24 Q This afternoon.

25 About how many hours you met with the Government



Copeland - Cross - Cannick

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1 in connection with this case?

2 A Several.

3 Q When you say several, more than ten?

4 A Yes.

5 Q More than 20?

6 A Hard to say. Probably.

7 Q Okay. Do you know, more than 30?

8 A I don't think so.

9 Q Okay. And during those meetings, they would suggest  
10 certain verbiage to you in terms of answering questions for  
11 you; am I correct?

12 A No, they did not.

13 Q They didn't suggest to you how to answer certain  
14 questions?

15 A No.

16 Q They didn't express a preference on terms of certain  
17 language or verbs to use?

18 A On some of the language, if they used it, I would in  
19 turn use it.

20 Q So they used words like directed, Mr. Kelly directed?

21 A Correct.

22 Q And Mr. Kelly instructed?

23 A Right.

24 Q Mr. Kelly commanded?

25 A I don't know if I've heard that one.

Copeland - Cross - Cannick

3233

1 Q Okay. But before your meeting with the Government you  
2 never in a conversation about Mr. Kelly said that he  
3 directed someone to do something; am I correct?

4 A No.

5 Q Or he instructed someone to do something; am I correct?

6 A No.

7 Q Okay. That language came from the Government?

8 A I don't know.

9 Q You can answer.

10 THE COURT: You can answer the question if it's  
11 correct you can say it is correct. If it's not, say it's  
12 not.

13 Did the Government suggest that you use that kind  
14 of language?

15 THE WITNESS: They did not suggest. But if they  
16 would say something in a certain way, I may repeat it that  
17 way, if that makes sense.

18 THE COURT: Okay. Well, next question.

19 MR. CANNICK: Okay.

20 Q And now, and you testified on direct exam that  
21 Mr. Kelly would require a female Uber driver when we were  
22 driving guests; am I correct?

23 A That's correct.

24 Q And basically it was a safety concern with Mr. Kelly;  
25 am I correct?

Copeland - Cross - Cannick

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1 MS. GEDDES: Objection.

2 THE COURT: Well, I don't know. Do you know, was  
3 it for safety?

4 THE WITNESS: I believe so, yeah.

5 Q And Uber drivers --

6 THE COURT: Give it a try.

7 MR. CANNICK: Give it a try?

8 THE COURT: Yeah.

9 Q Uber drivers have been known to rape --

10 MS. GEDDES: Objection.

11 THE COURT: Sustained.

12 MR. CANNICK: I gave it a shot.

13 THE COURT: You gave it a shot.

14 Q Okay. Now, they kill passengers, too?

15 MS. GEDDES: Objection.

16 THE COURT: Mr. Cannick, come on.

17 Sustained, if I didn't.

18 MR. CANNICK: I'll went with, "Come on."

19 Q You -- part of your job is that you arrange flights for  
20 Mr. Kelly's guests?

21 A That's correct.

22 Q And hotel accommodations?

23 A That's correct.

24 Q And those would be for his girlfriends?

25 A That's correct.

Copeland - Cross - Cannick

3235

1 Q And also for his friends?

2 A Friends, record label executives, business associates.

3 Q Anyone who he asked you to bring to into town, you  
4 would make the arrangements for?

5 A That's correct.

6 Q Did you have any instructions for them when they  
7 arrived?

8 A It would depend on if it was a hotel room most of the  
9 time, yes.

10 Q Okay. Now, you testified and told us about a situation  
11 you were in an elevator with one of Mr. Kelly's girlfriends,  
12 Joycelyn.

13 Do you remember telling us about that?

14 A Yes.

15 Q And you testified that she was looking at the rear of  
16 the elevator?

17 A Yes.

18 Q Did they're still together; am I correct?

19 A I don't know.

20 Q You don't know?

21 A (Witness shakes head negatively.)

22 Q Okay. Now, would you also have responsibility for  
23 Mr. Kelly's security concerns; am I correct?

24 A I'm sorry, can you repeat that.

25 Q You had some responsibility in making sure that

Copeland - Cross - Cannick

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1 Mr. Kelly was secure; am I correct?

2 A Absolutely, yes.

3 Q And you took that in consideration every time you were  
4 dealing with him, you want to make sure that he was safe; am  
5 I correct?

6 A Yes.

7 Q And the van -- withdrawn.

8 The Sprinter having its blind pulled up so that no  
9 one could see in or see out, that was a security measure; am  
10 I correct?

11 A Yes.

12 Q And how many security personnel did he have?

13 A At any given time, at least three or four.

14 Q And basically they worked to make sure that he was  
15 secure; am I correct?

16 A Correct.

17 Q And did he have security for his girlfriends?

18 A There was one female security guard.

19 Q Okay. And that person was named Candy?

20 A Yes.

21 Q And Candy pretty much made sure that the girls were  
22 safe, the young ladies were safe?

23 A Yes.

24 Q Okay.

25 And basically protecting and securing Mr. Kelly

Copeland - Cross - Cannick

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1 was paramount; am I correct?

2 A Correct.

3 Q He was the meal ticket; am I correct?

4 MS. GEDDES: Objection.

5 THE COURT: Overruled.

6 A Yes.

7 Q And it was important to him that he was kept safe as  
8 well as his girlfriends; am I correct?

9 MS. GEDDES: Objection.

10 THE COURT: Sustained.

11 Q When he had security for his girlfriends; am I correct?

12 A Correct.

13 Q Now, you testified and told us about a situation where  
14 you were by the Lifetime Fitness Center with Anna --

15 A Yes.

16 Q -- in the Sprinter.

17 And you testified that she really needed to use  
18 the facility?

19 A Yes.

20 Q The rest room.

21 And basically Mr. Kelly was inside the facility  
22 and he was working out?

23 A Correct.

24 Q And didn't have his cell phone with him?

25 A Correct.

Copeland - Cross - Cannick

3238

1 Q And she could not reach him?

2 A Correct.

3 Q And instead of going, she decided she would wait and  
4 continue to try to reach him?

5 A Yes.

6 Q Now, you didn't prevent her from going to the rest  
7 room; am I correct?

8 A No.

9 Q In fact, you wanted her and encouraged her to go to the  
10 rest room; am I correct?

11 A I did.

12 Q And Mr. Kelly never told you to deny her to use the  
13 facility; am I correct?

14 A No. In that particular situation he got mad because I  
15 didn't really press her to go --

16 Q Okay.

17 A -- on her own.

18 Q So he was angry at you for not letting her --

19 A Yes.

20 Q -- for not encouraging her to go?

21 A Yes.

22 Q Now you also testified and told us on direct that there  
23 were times that you would make reservations at a hotel for  
24 Mr. Kelly and he would use a fictitious name for him; am I  
25 correct?

Copeland - Cross - Cannick

3239

1 A That's correct.

2 Q Now that was a security concern; am I correct?

3 A Yes.

4 Q And, in fact, it's commonplace for artists,  
5 entertainers, celebrities to use fictitious names to ensure  
6 their security when they go to these places; am I correct?

7 MS. GEDDES: Objection.

8 THE COURT: Overruled.

9 A That is correct.

10 Q Now, you testified and told us about a time that Anna  
11 was smoking marijuana on the property?

12 A I --

13 MS. GEDDES: Objection. I don't think that's the  
14 testimony.

15 MR. CANNICK: Okay. Well, we'll see.

16 Q Do you recall a time when Anna was smoking marijuana on  
17 one of Mr. Kelly's properties in Atlanta?

18 A I do recall it.

19 Q Okay. And do you recall calling Mr. Kelly and letting  
20 him know that?

21 A I do.

22 Q Okay. And Mr. Kelly was not pleased to hear that; am I  
23 correct?

24 A No, he was not.

25 Q And he and Anna had an exchange about it?



Copeland - Cross - Cannick

3240

1 A I believe so, yes.

2 Q And Anna was very angry?

3 A I -- I believe so.

4 Q Right.

5 And as a result of this exchange, Mr. Kelly did  
6 not take Anna on a cruise that he was about to go on; am I  
7 correct?

8 A I did not now that was the reason.

9 Q Okay. But she didn't go on the cruise, right?

10 A That's correct.

11 Q And, in fact, she left -- she left Mr. Kelly; am I  
12 correct?

13 A That's correct.

14 Q And at some point she ultimately returned?

15 A Correct.

16 MR. CANNICK: Excuse me, Your Honor, I can't  
17 remember what time you said we were taking a break.

18 THE COURT: We've got some time.

19 MR. CANNICK: I just need some water.

20 THE COURT: Oh, go ahead.

21 MR. CANNICK: I don't have any.

22 THE COURT: Okay.

23 (Pause in proceedings.)

24 MR. CANNICK: Thanks.

25 Q Okay. Now, there was part of your testimony last week

Copeland - Cross - Cannick

3241

1 when you spoke about Mr. Kelly and you having a conversation  
2 and he told you that someone said, this person said that you  
3 let Anna escape.

4 Do you remember saying that?

5 A Correct.

6 Q Now, those were -- Mr. Kelly never used the word  
7 "escape"; am I correct, other than repeating what someone  
8 said?

9 A Yes.

10 Q And when the Government said here who used that word  
11 "escape" and your answer was Mr. Kelly, you were talking  
12 about Mr. Kelly repeating what someone else said; am I  
13 correct?

14 A That is correct.

15 Q You weren't suggesting that Mr. Kelly told you that you  
16 let someone escape, right?

17 A That is correct.

18 Q Okay. In fact, did you in you 15 years with Mr. Kelly,  
19 ever try to prevent someone from leaving?

20 A Never.

21 Q And women left him many times; am I correct?

22 A Many times.

23 Q And have you ever heard of Mr. Kelly or -- well, let me  
24 back up.

25 Have you ever seen Mr. Kelly physically try to

Copeland - Cross - Cannick

3242

1 stop someone from leaving him?

2 A Never.

3 Q Have you heard of him suggesting to someone else to  
4 prevent someone from leaving him?

5 A Never.

6 Q In fact, when they left Mr. Kelly was the one who paid  
7 for their airfare; am I correct?

8 A That's correct.

9 Q What Mr. Kelly's issue was --

10 MS. GEDDES: Objection.

11 THE COURT: Sustained as to form.

12 Q Mr. Kelly did not want them to take any of the items he  
13 purchased for them, correct?

14 MS. GEDDES: Objection.

15 THE COURT: Sustained.

16 Q Did you ever try to stop someone from leaving  
17 Mr. Kelly?

18 A No.

19 Q Now you testified and told us about seeing a gun behind  
20 the bar. Do you remember telling us about that?

21 A That is correct.

22 Q Okay. Now how close did you get to that gun?

23 A Maybe about 12 inches away.

24 Q Okay. And you didn't examine the gun, did you?

25 A No.

Copeland - Cross - Cannick

3243

1 Q Okay. Now, you worked with Mr. Kelly for over 15 years  
2 in both his house and his business. Did you ever see him in  
3 possession of a gun?

4 A Never.

5 Q When you saw the gun that day, do you recall what time  
6 of day it was?

7 A I believe it was nighttime.

8 Q And do you recall who, if anyone else, was in the bar  
9 at that time?

10 A I believe it was -- besides the engineers, that I was  
11 the only ere person there.

12 Q And you don't know who was in the bar before you got  
13 there; am I correct?

14 A I'm sorry?

15 Q You don't know who was in the bar before you got there?

16 A I do not.

17 Q All right. You didn't like some of the rules  
18 Mr. Kelly -- rules or policies that Mr. Kelly had; am I  
19 correct?

20 A Correct.

21 Q But notwithstanding, you would still return and work  
22 for him?

23 A That is correct.

24 Q Even times that you quit?

25 A That is correct.

Copeland - Cross - Cannick

3244

1 Q Those policies and procedures were still in place when  
2 you returned?

3 A That is correct.

4 Q And that letter of -- withdrawn.

5 At any point in time that you were working for  
6 Mr. Kelly, did he ever instruct you to recruit women for  
7 him?

8 A No.

9 Q Did you ever hear him ask others to recruit women for  
10 him?

11 A No, I did not.

12 Q Did you ever see Mr. Kelly take rooftop dinners with  
13 his girlfriends?

14 A Yes.

15 Q To expensive restaurants?

16 A Yes.

17 MR. CANNICK: I'm almost there, Your Honor.

18 THE COURT: Okay.

19 Q Now, the computer that you spoke of early that went  
20 missing, that computer basically had Mr. Kelly's information  
21 on it; am I correct?

22 A Correct.

23 Q You basically used that computer to perform his job  
24 responsibilities -- withdrawn.

25 You basically used that computer to help you, and

Copeland - Cross - Cannick

3245

1 assist you in doing your job as it related to him; am I  
2 correct?

3 A That's correct.

4 Q So the information on that computer was his  
5 information; am I correct?

6 A That's correct.

7 Q Now, when you said that Mr. Kelly, your -- withdrawn.

8 That your responsibilities in your last stint was  
9 to help try to track down and trace his monies, Mr. Kelly  
10 generated very large sums of revenue; am I correct?

11 MS. GEDDES: Objection.

12 THE COURT: Sustained as to form.

13 Q Mr. Kelly's -- you were aware of his earning  
14 capacity -- withdrawn.

15 You had some involvement with his -- familiarity  
16 with his contracts?

17 A Correct.

18 Q And he collected -- he was generated revenues from  
19 royalties?

20 A Correct.

21 Q Record sales?

22 A Correct.

23 Q Record production?

24 A Correct.

25 Q Song writing?

Copeland - Cross - Cannick

3246

1 A Correct.

2 Q Mr. Kelly generated hundreds of millions of dollars; am  
3 I correct?

4 A That is correct.

5 Q Now, in the 15 years that you worked with Mr. Kelly,  
6 did you ever see him try to stop or prevent any one of his  
7 girlfriends from leaving him?

8 A No.

9 Q Have you ever saw him lock any of his girlfriends in a  
10 room?

11 A Never.

12 Q Has he ever asked you to do such a thing?

13 A Never.

14 Q Have you ever heard him ask any of his staff to do such  
15 a thing?

16 A Never.

17 Q Did you ever see Mr. Kelly deny any of his girlfriends  
18 water?

19 A Never.

20 Q Did you ever hear him ask anyone else to deny them  
21 water?

22 A No.

23 Q Did he ever ask you to deny the water?

24 A No.

25 Q What about food, have you ever seen him deny them food?

Copeland - Cross - Cannick

3247

1 A No.

2 Q In fact, they had Uber accounts for the girlfriends?

3 A They did.

4 Q They had menus all across the place to order food; am I  
5 correct?

6 A Yes.

7 Q And they had runners available to them to go and get  
8 food; am I correct?

9 A That's correct.

10 Q And they had personal assistants to also assist them  
11 with getting food, water, drinks, shopping, anything of  
12 those things; am I correct?

13 A That is correct.

14 Q You did not see anyone in Mr. Kelly's employment do any  
15 of those things in terms of denying women food, water,  
16 drinks?

17 A No.

18 Q Never saw anyone locked in a room?

19 A Never.

20 Q And you'd come to work, just do your job to the best of  
21 your abilities; am I correct?

22 A That's correct.

23 MR. CANNICK: Your Honor, I have nothing further.

24 THE COURT: All right. Any redirect?

25 MS. GEDDES: Yes, Your Honor.



Copeland - Redirect - Geddes

3248

1 REDIRECT EXAMINATION

2 BY MS. GEDDES:

3 Q Is it fair to say that testifying here today is hard  
4 for you?

5 A That is correct.

6 Q And when you stopped working for the defendant, was  
7 part of that because your name had been out there in the  
8 media?

9 A That's not correct.

10 Q Were you concerned about how your name was portrayed in  
11 media at some point?

12 A Yes, that's correct.

13 Q And does that still concern you here today?

14 A No, it does not.

15 Q You're not concerned about how the media will react to  
16 your testimony here today?

17 A No, I'm not.

18 Q On cross-examination you were asked about that letter  
19 that I showed you which admitted -- or claimed to admit to  
20 stealing from the defendant. Do you recall those questions?

21 A I do.

22 Q Were you the only person who was working for the  
23 defendant who wrote that letter?

24 MR. CANNICK: Objection.

25 THE COURT: Overruled.

Copeland - Redirect - Geddes

3249

1           To your knowledge, did you ever see other people  
2 write those letters?

3           THE WITNESS: I did not.

4       Q     Did you hear about -- I think in your direct  
5 examination you testified about he asked others to write  
6 that letter; is that correct?

7       A     That's that I was told, yes.

8       Q     And the misunderstanding that you had, that had nothing  
9 to do with stealing from him, correct?

10      A     I don't believe I remember what the misunderstanding  
11 was about.

12      Q     I just want to be clear: Did you ever steal from the  
13 defendant?

14      A     No, I did not.

15      Q     So when you wrote that you stole from the defendant,  
16 that was not true, correct?

17      A     That's correct.

18      Q     And you wrote that because the defendant wanted you to  
19 write that, correct?

20      A     That is correct.

21      Q     And the defendant told you that it was his attorney's  
22 idea to write that letter, correct?

23      A     That is correct.

24      Q     On cross-examination you were asked about how you would  
25 dress when you were working for the defendant. Do you

Copeland - Redirect - Geddes

3250

1 recall that?

2 A Yes.

3 Q Whose choice was it for you to wear the clothing that  
4 you wore on a day-to-day basis while you worked for the  
5 defendant?

6 A It was my choice.

7 Q The defendant never told how to dress, correct?

8 A Never.

9 Q And you remember also being asked about whether people  
10 could roam within -- well, first off think about  
11 Olympia Fields where the defendant was living. And you  
12 testified that people were not allowed to roam; is that  
13 correct?

14 A That is correct.

15 Q But you were allowed to freely roam around  
16 Olympia Fields, weren't you?

17 A That is correct.

18 Q And you were also asked about who put in place the rule  
19 that individuals not roam around Olympia Fields, and I  
20 believe you testified that it was his wife; is that correct?

21 A That is correct.

22 Q Was his wife there after the first two years that you  
23 worked for the defendant?

24 A No, she was not.

25 Q And did the rule stay in place after you worked for the

Copeland - Redirect - Geddes

3251

1 defendant?

2 A Yes, they did.

3 Q While you worked for the defendant?

4 A (No audible response.)

5 Q You were asked on cross-examination about what you  
6 would do when you shopped for the defendant; is that  
7 correct?

8 A Right.

9 Q And you testified that you would interact with  
10 salespeople on behalf of the defendant, correct?

11 A That is correct.

12 Q And would you interact with both female and male sales  
13 employees when you were with the defendant?

14 A No, just the males.

15 Q You wouldn't help them with the female employees?

16 A I'm sorry. I don't think -- can you repeat the  
17 question?

18 Q Sure. When you were shopping with the defendant --

19 A Okay.

20 Q -- acting as his executive assistant, you testified  
21 that you would interact with salespeople; is that correct?

22 A That's correct.

23 Q And would you interact when you were with the defendant  
24 with both men and women?

25 A Correct.

Copeland - Redirect - Geddes

3252

1 Q When you were with the defendant's live-in girlfriend  
2 at the mall, who would you interact with?

3 A The male.

4 Q And the defendant's live-in girlfriends would interact  
5 on their own with female salespeople, correct?

6 A That is correct.

7 Q When you were working for the defendant, who was in  
8 charge of what you did on a day-to-day basis?

9 A Robert.

10 Q And at any point, who did you consider to be your boss?

11 A Robert.

12 Q And as your boss, is it fair to say that he gave you  
13 direction?

14 A Correct.

15 Q And I don't want to put words into your mouth. How  
16 would you describe what -- the words that the defendant gave  
17 you?

18 A In terms of which words.

19 (Continued on the next page.)

20

21

22

23

24

25

Copeland - redirect - Geddes

3253

1 EXAMINATION CONTINUES

2 BY MS. GEDDES:

3 Q When the defendant asked you to do something, did you  
4 understand that it was something the defendant wanted you to  
5 do?

6 A That is correct.

7 Q And did you do it because the defendant asked you to do  
8 it?

9 A Correct.

10 Q And over your 15 years, did the defendant ask you to do  
11 many different things?

12 A Correct.

13 Q And because the defendant was your boss, is it fair to  
14 say that you followed through with his requests?

15 A That is correct.

16 Q And as part of your working for the defendant, did the  
17 defendant ask you to assist him with his female guests and  
18 live-in girlfriends?

19 A That is correct.

20 Q And did you follow through with what the defendant asked  
21 you to do and help out with his female guests and live-in  
22 girlfriends?

23 A Yes.

24 Q You were asked on cross-examination about whether you saw  
25 Anna smoking marijuana.

SAM

OCR

RMR

CRR

RPR

Copeland - redirect - Geddes

3254

1 Do you recall that?

2 A I do.

3 Q Who told the defendant about Anna smoking marijuana?

4 A I believe it was me.

5 Q And did you do that because you understood that was  
6 something the defendant would want to know?

7 A I knew that it was against the rules, yes. So, yes.

8 Q And on -- did you sometimes act as an extension of the  
9 defendant when he was not around?

10 A Yes.

11 Q In fact, were those your words in characterizing your  
12 responsibilities in working for the defendant?

13 A Can you clarify that question?

14 Q Sure. Did you view one of your responsibilities in  
15 working for the defendant to be an extension of him when he  
16 could not be present?

17 A Yes.

18 Q And did you use those words to describe to the Government  
19 how you viewed your role in working for the defendant?

20 A I did, yes.

21 Q You were asked on cross-examination about the computer  
22 that went missing when you were at the defendant's studio.

23 Do you recall those questions?

24 A Yes.

25 Q Did the defendant buy you that computer?

Copeland - redirect - Geddes

3255

1 A No.

2 Q Did the defendant reimburse you for that computer?

3 A No.

4 Q Has the defendant ever given you back that computer?

5 MR. CANNICK: Objection.

6 THE COURT: Well, sustained as to form.

7 Have you ever gotten the computer back?

8 THE WITNESS: No.

9 THE COURT: Okay.

10 BY MS. GEDDES:

11 Q Were you present -- were you able to hear the  
12 defendant's, all of the defendant's interactions with his  
13 live-in girlfriends?

14 A No.

15 Q Fair to say, that you don't know exactly what went on  
16 behind closed doors?

17 A Fair to say, yes.

18 Q And when you received requests -- when you testified  
19 about what happened at the LA Fitness when Anna needed to use  
20 the bathroom, what did Anna ask you to do?

21 A Call Mr. Kelly.

22 Q And what did you do?

23 A I called Mr. Kelly.

24 Q And why was it that -- were you able to get in touch with  
25 the defendant?

SAM

OCR

RMR

CRR

RPR



Copeland - redirect - Geddes

3256

1 A No.

2 Q And did you call him repeatedly?

3 A Yes.

4 Q You were asked on cross-examination about various  
5 girlfriends and female guests of the defendant; is that right?

6 A That is correct.

7 Q And you were asked about certain events and opportunities  
8 afforded to some of those -- to those female guests and  
9 live-in girlfriends, correct?

10 A Correct.

11 Q And you answered yes to a lot of the defense attorney's  
12 questions about what those individuals were afforded, correct?

13 A That is correct.

14 Q Fair to say that the defendant had many different guests  
15 and live-in girlfriends over the course of your fifteen years?

16 A Yes.

17 Q And that as you sit here today, can you speak for each of  
18 those female guests and live-in girlfriends?

19 MR. CANNICK: Objection.

20 THE COURT: Overruled.

21 A No.

22 Q And while you testified about certain things that were  
23 given to them, you were talking about them as a whole,  
24 correct?

25 A That is correct.

SAM

OCR

RMR

CRR

RPR

Copeland - redirect - Geddes

3257

1 Q You weren't talking about each of the defendant's guests,  
2 female guests or live-in girlfriends individually, correct?

3 A Correct.

4 Q You were asked about the defendant's reading and writing  
5 abilities.

6 Do you recall that?

7 A Correct.

8 Q Did you communicate with the defendant by text message?

9 A Yes.

10 Q And would you write texts to the defendant?

11 A Yes.

12 Q And would you receive text messages from the defendant?

13 A Yes.

14 Q And on occasion did you help the defendant read certain  
15 text messages that he had received?

16 A Yes.

17 Q And how was it that the defendant was able to send you  
18 text messages?

19 A Mostly talk-to-text.

20 Q So, he was able to dictate communications, and then it  
21 was translated into text; is that correct?

22 A Correct.

23 Q And on occasion did you also help him draft text messages  
24 before that talk-to-text function existed?

25 A I have, yes.

SAM

OCR

RMR

CRR

RPR

Copeland - cross - Cannick

3258

1 Q And were you relieved when talk-to-text came into place?

2 A Yes.

3 Q Took away some of your responsibilities, yes?

4 MS. GEDDES: One moment.

5 (Pause.)

6 MS. GEDDES: Nothing further.

7 THE COURT: All right, any recross?

8 MR. CANNICK: Very briefly.

9 RECROSS-EXAMINATION

10 BY MR. CANNICK:

11 Q Ms. Copeland, you were just asked a few minutes ago about  
12 your ability to roam around Mr. Kelly's home.

13 Do you remember that question just being asked?

14 A Yes.

15 Q You were, essentially, for lack of a better word, the CEO  
16 of the operation of the home, am I correct?

17 MS. GEDDES: Objection.

18 A That's correct.

19 THE COURT: Were you the CEO?

20 Q Your job was to manage that home, am I correct?

21 A Yes.

22 Q And so, it was natural that you would have access to roam  
23 and do whatever you wanted in order to keep that home  
24 afloat --

25 A That is correct.

Copeland - cross - Cannick

3259

1 Q -- am I correct?

2 And even with that ability to roam and do whatever  
3 you wanted to do, you still had to knock, am I correct?

4 A I did, yes.

5 Q Everyone had to knock, am I correct?

6 A That is correct.

7 Q Now, you were just also asked about assisting Mr. Kelly  
8 and his female guests and his live-in guests.

9 That was also part of your task, as well as that of  
10 the runners and their personal assistants, is that correct?

11 A That is correct.

12 Q Mr. Kelly wanted them to have their conference and their  
13 safety and their needs addressed?

14 MS. GEDDES: Objection.

15 THE COURT: Sustained.

16 BY MR. CANNICK:

17 Q Well, wasn't that part of your responsibility, to take  
18 care of their safety?

19 A Yes.

20 Q Their comfort?

21 A Yes.

22 Q Their needs?

23 A Yes.

24 Q Now, the Government asked you about a computer, did you  
25 ever receive the computer back.

SAM

OCR

RMR

CRR

RPR

Copeland - cross - Cannick

3260

1           You don't know who took your computer, am I correct?

2   A     I do not.

3   Q     And the computer, basically, had Mr. Kelly's information  
4   on it, am I correct?

5   A     That's correct.

6   Q     Okay. And you filed a report for the computer, am I  
7   correct, a police report?

8   A     I did.

9           MR. CANNICK: Just one second, please, Your Honor.

10          (Pause.)

11   BY MR. CANNICK:

12   Q     And you were asked this just a second ago about Anna  
13   being on the bus, on the Sprinter, and needing to go to the  
14   bathroom.

15           I think you told us that when Mr. Kelly returned, he  
16   got on you because you didn't prod Anna enough to make sure  
17   that she took care of herself?

18   A     That is correct.

19           MR. CANNICK: Nothing further.

20           THE COURT: All right, anything else?

21           MS. GEDDES: No.

22           THE COURT: All right, thanks so much. The witness  
23   can step down.

24           (Witness steps down and exits courtroom.)

25           THE COURT: All right, I am going to dismiss you for

## Proceedings

3261

1 a break in a minute, ladies and gentlemen, I just want to  
2 speak to my courtroom deputy for just a second here.

3 (Pause.)

4 THE COURT: I am just trying to figure out, this  
5 will be a slightly longer break, we are going to do  
6 20 minutes, but do not talk about the case at all. Don't talk  
7 about any aspect of the case, but have a nice break. We'll  
8 see you, 20, 25 minutes or so.

9 THE COURTROOM DEPUTY: All rise.

10 (Jury exits.)

11 THE COURT: All right, everybody can have a seat.

12 Let me just see counsel at the side. We don't need  
13 to have a court reporter, just scheduling.

14 (Sidebar held off the record with the Court and  
15 counsel only, outside the hearing of the jury.)

16 (Defendant exited the courtroom.)

17 (Recess taken; Judge ANN M. DONNELLY exited  
18 courtroom.)

19

20 (Continued on the following page.)

21

22

23

24

25

Sidebar

3262

1 (The following took place in a jury room with the  
2 Court, counsel for both sides and Alternate Juror No. 4,  
3 outside of the presence of the jury.)

4 THE COURT: How are you doing?

5 ALTERNATE JUROR NO. 4: Okay.

6 THE COURT: Don't worry. I am told that you asked  
7 about getting Gloria Allred's autograph.

8 ALTERNATE JUROR NO. 4: Yes.

9 THE COURT: So, I just want to make sure, why did  
10 you want it?

11 ALTERNATE JUROR NO. 4: Because I admire her. Just  
12 'cause, you know, other cases. I've never heard -- I didn't  
13 know she was gonna be here, I just admire her for what she's  
14 accomplished.

15 THE COURT: I just want to make sure, you're  
16 impressed with her?

17 ALTERNATE JUROR NO. 4: Yes, that's right.

18 THE COURT: I just want to make sure that you won't  
19 give any of the witnesses that she represents any additional  
20 credibility just because --

21 ALTERNATE JUROR NO. 4: No, no, no.

22 THE COURT: -- just because she happens to be in  
23 connection with them?

24 ALTERNATE JUROR NO. 4: No, no.

25 THE COURT: Okay. So, at the end of the case I am

SAM

OCR

RMR

CRR

RPR

Sidebar

3263

1 going to be telling you how to evaluate the credibility of the  
2 witnesses who testify and that you have to be able to apply  
3 those instructions irrespective of the fact that Ms. Allred  
4 might have represented --

5 ALTERNATE JUROR NO. 4: She had nothing to do with  
6 any of it, she just sat there.

7 I mean, as I said, I just -- I was impressed by the  
8 fact that she was there, that's all. It has nothing to do  
9 with --

10 THE COURT: Okay. So, you are not going to give any  
11 of those --

12 ALTERNATE JUROR NO. 4: No.

13 THE COURT: -- witnesses any special favor?

14 ALTERNATE JUROR NO. 4: No, because she -- I  
15 understand she's there to represent them, but she really had  
16 no input in anything, at least in my opinion.

17 THE COURT: Okay.

18 ALTERNATE JUROR NO. 4: I don't know what happened  
19 with her -- you know, what happened with them and her  
20 otherwise.

21 THE COURT: And it's not relevant.

22 ALTERNATE JUROR NO. 4: No, right, I'm saying -- but  
23 I'm saying for me it was just that, oh, you know, like a fan  
24 girl kind of thing.

25 THE COURT: Okay, but even feeling that way, I just

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Sidebar

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1 have to make absolutely sure that you are not going to hold it  
2 against Mr. Kelly --

3 ALTERNATE JUROR NO. 4: No, no, no.

4 THE COURT: -- or give those witnesses any  
5 additional credibility?

6 ALTERNATE JUROR NO. 4: No, because all I'm doing is  
7 listening to what they say, what the defense asks them, what  
8 the prosecution asks them, the way they answer questions that  
9 are asked.

10 THE COURT: And just bottom line, you are going to  
11 treat those witnesses just like any other witness?

12 ALTERNATE JUROR NO. 4: Absolutely.

13 THE COURT: Anything that either of you wants me to  
14 ask?

15 MR. SCHOLAR: No, Your Honor; thank you.

16 MS. GEDDES: No.

17 THE COURT: And, obviously, don't talk about this  
18 with anybody?

19 ALTERNATE JUROR NO. 4: About what?

20 THE COURT: Good answer. All right, thank you so  
21 much.

22 ALTERNATE JUROR NO. 4: Thank you.

23 THE COURT: Donna, do you want to take the juror?

24 THE COURTROOM DEPUTY: I'll take her, yes.

25 (Alternate Juror No. 4 exits the jury room.)

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Sidebar

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1 THE COURT: You don't want do anything; do you?

2 MR. SCHOLAR: I would ask that she be removed. I  
3 just want to make the record.

4 THE COURT: You want her to be removed?

5 MR. SCHOLAR: Yes.

6 THE COURT: On what basis?

7 MR. SCHOLAR: I can't think of anything more  
8 disqualifying than a juror asking for the autograph of one of  
9 the attorneys who represents one of the witnesses. It speaks  
10 to a bias for the prosecution's witnesses, and for that reason  
11 I would ask that she be removed.

12 THE COURT: What's your position?

13 MS. GEDDES: I think there's no basis for her  
14 removal here. She made clear that she is not attaching any  
15 additional weight to those witnesses' credibility and that she  
16 will follow Your Honor's instructions to make a decision based  
17 solely on the testimony before her.

18 And so I think in light of her responses, there's no  
19 reason to remove her.

20 THE COURT: I think based on her responses, and they  
21 were sincere, she did not hesitate in saying that she didn't  
22 even connect Ms. Allred with the witness really, and as I said  
23 , I don't know that anybody would have noticed that Ms. Allred  
24 was in the courtroom because she had a mask on if it hadn't  
25 been brought up, which is fine to bring up, but the lawyers

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Sidebar

3266

1 are sitting there in their representative capacity.

2 I understand the concern, which is why I had the  
3 juror brought in, but I think under the circumstances she has  
4 given us assurances that she can judge the witnesses fair and  
5 impartially, and so I am going to deny the application, but  
6 you have an exception.

7 MR. SCHOLAR: Thank you, Your Honor.

8 THE COURT: And she's Alternate 4?

9 MS. GEDDES: That's what I think you described her  
10 as.

11 (Sidebar in a jury room concluded.)

12

13 (Continued on the following page.)

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Proceedings

3267

1 (Pause in the proceedings.)

2 (In open court - jury not present.)

3 THE COURTROOM DEPUTY: All rise.

4 (Judge ANN M. DONNELLY entered the courtroom.)

5 THE COURT: Everybody can sit down.

6 (Defendant entered the courtroom.)

7 THE COURT: Okay, who is our next witness?

8 MS. SHIHATA: Angela.

9 THE COURT: Angela, okay.

10 (Pause.)

11 (Witness enters and takes the stand.)

12 THE COURT: Can I just see the lawyers at the side?

13 I don't need the court reporter, just for a minute.

14 (Sidebar held off the record with the Court and

15 counsel only, outside the hearing of the jury.)

16 THE COURTROOM DEPUTY: All rise.

17 (Jury enters.)

18 THE COURTROOM DEPUTY: You may be seated.

19 THE COURT: All right, everybody, we are ready to

20 resume.

21 Will you call your next witness, please.

22 MS. SHIHATA: Yes; the Government calls Angela.

23 THE COURT: Okay, you can take off your mask. Just

24 a few things before we begin.

25 THE COURTROOM DEPUTY: Please stand and raise your

## Proceedings

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1 right hand.

2 Do you solemnly swear or affirm that the testimony  
3 you are about to give will be the truth, the whole truth, and  
4 nothing but the truth?

5 THE WITNESS: Yes.

6 (Witness sworn.)

7 THE COURTROOM DEPUTY: Thank you, you may be seated.

8 THE COURT: Thank you, Donna.

9 As I was saying, there are just a few things to keep  
10 in mind. It is really important that the jurors hear what you  
11 have to say, so I am going to ask you to make sure you use the  
12 microphone. Sometimes it's easier just to hold it, then you  
13 don't have to keep leaning in.

14 The second thing is our court reporter takes down  
15 everything that you have to say, and so it's important that  
16 you not talk too fast. I just want to make sure that we get  
17 an accurate record of what you're saying. And for the same  
18 reason, don't speak over whichever lawyer is asking you  
19 questions.

20 If there is a question that isn't clear or you want  
21 to have repeated, let me know and I'll have the lawyer  
22 rephrase it.

23 And just do your best to answer only the question  
24 that you're being asked, okay?

25 THE WITNESS: Yes, ma'am.

Proceedings

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1 THE COURT: Go ahead.

2 MS. SHIHATA: Thank you, Your Honor.

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4 (Continued on the following page.)

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Angela - direct - Shihata

3270

1 **ANGELA,**

2 called as a witness by the Government, having been  
3 duly sworn/affirmed by the Courtroom Deputy, was examined  
4 and testified as follows:

5 DIRECT EXAMINATION

6 BY MS. SHIHATA:

7 Q Good afternoon.

8 A Good afternoon.

9 THE COURT: Woops, I don't think it's on. There is  
10 a button on the top.

11 THE WITNESS: Good afternoon.

12 THE COURT: There you go. Try it again.

13 THE WITNESS: Good afternoon.

14 THE COURT: Okay, it works.

15 Go ahead.

16 MS. SHIHATA: I am showing the witness only what's  
17 been marked for identification as Government Exhibit 82.

18 Q Do you recognize this photo?

19 A Yes, I do.

20 Q Who is this a photo of?

21 A That is myself.

22 MS. SHIHATA: I move to admit Government Exhibit 82.

23 THE COURT: Any objection?

24 MR. CANNICK: None.

25 THE COURT: Okay, that's in evidence.

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Angela - direct - Shihata

3271

1 (Government's Exhibit 82 was received in evidence.)

2 BY MS. SHIHATA:

3 Q I am now showing you what's been marked for  
4 identification as Government Exhibit 82(a).

5 Is this the same photograph with your true first and  
6 last name?

7 A That is correct.

8 MS. SHIHATA: I move to admit Government Exhibit 82  
9 and publish for the jury only, please.

10 THE COURT: Any objection?

11 MR. CANNICK: No.

12 MS. SHIHATA: Sorry, 82(a).

13 THE COURT: No objection, right?

14 MR. CANNICK: None.

15 THE COURT: All right, that's in evidence.

16 (Government's Exhibit 82(a) was received in  
17 evidence.)

18 MS. SHIHATA: And may we publish to the jury only,  
19 please?

20 (Exhibit published to the jury only.)

21 BY MS. SHIHATA:

22 Q Now, for purposes of your testimony here today, we are  
23 going to refer to you as Angela. Okay?

24 A Yes, ma'am.

25 Q And I am showing you what's been marked for



Angela - direct - Shihata

3272

1 identification as Government Exhibit 82(b).

2 Is this the same photograph that I've just shown you  
3 with the name "Angela" underneath?

4 A Yes, it is.

5 MS. SHIHATA: I move to admit Government  
6 Exhibit 82(b).

7 MR. CANNICK: No objection.

8 THE COURT: That's in evidence.

9 (Government's Exhibit 82(b) was received in  
10 evidence.)

11 MS. SHIHATA: Thank you.

12 BY MS. SHIHATA:

13 Q How old are you?

14 A I am 44 years old.

15 Q And when were you born?

16 A November 19th, 1976.

17 Q Where did you grow up?

18 A Chicago, Illinois.

19 THE COURT: I'm sorry. I don't think there's  
20 anything on.

21 A JUROR: It wasn't on before either.

22 THE COURT: Let's try it again.

23 MS. SHIHATA: I'll just quickly publish the photos  
24 that we entered into evidence.

25 So, here is 82.

Angela - direct - Shihata

3273

1 (Exhibit published to the jury only.)

2 THE COURT: You got it now? Good, good, thanks.

3 MS. SHIHATA: 82(b), sorry, 82(a).

4 (Exhibit published to the jury only.)

5 MS. SHIHATA: And 82(c) -- (b), sorry.

6 (Exhibit published to the jury only.)

7 THE COURT: Okay.

8 BY MS. SHIHATA:

9 Q All right, now, you grew up in Chicago, is that right?

10 A Yes, ma'am.

11 Q And how far did you -- did you go in school?

12 A I have a degree in clinical massage therapy.

13 Q And did you finish high school or did you get your go  
14 ahead?

15 A I got my go ahead, ma'am.

16 Q Approximately when did you stop going to high school?

17 A In 1991.

18 Q And approximately, when did you get your go ahead?

19 A 2008.

20 Q Are you currently employed?

21 A Yes, I am.

22 Q And what kind of work do you do?

23 A I am in retail, and I am also a clinical massage  
24 therapist.

25 Q I am showing you Government Exhibit 1.

Angela - direct - Shihata

3274

1 Do you recognize this person?

2 A Yes, I do.

3 Q And who is this person?

4 A That's Rob.

5 Q Do you know his full name?

6 A Robert Sylvester Kelly.

7 Q Have you met Robert Kelly in person?

8 A Yes, I have.

9 Q Do you see him in the courtroom here today?

10 A Yes, I do.

11 Q Can you point him out and identify him by an item of  
12 clothing he's wearing?

13 A He's the gentleman in the gray suit, black glasses.

14 THE COURT: Indicating the defendant.

15 BY MS. SHIHATA:

16 Q Around when did you first meet the defendant?

17 A 1991.

18 Q Do you recall what grade you were in at the time?

19 A It was the break between freshman and sophomore year.

20 Q And about how old were you at that time?

21 A Fourteen, fifteen.

22 Q And at that time in your life, what, if anything -- what,  
23 if any, career aspirations did you have?

24 A I wanted to sing and to dance, entertainment.

25 Q Now, you testified you met the defendant in 1991.

Angela - direct - Shihata

3275

1           After meeting him, did you spend time regularly with  
2 the defendant for several years after that?

3 A     Yes, I did.

4 Q     Until approximately when did you spend time regularly  
5 with him?

6 A     Mid '90s.

7 Q     And did that include times when you worked for him as a  
8 backup dancer?

9 A     That is correct.

10 Q     And after you stopped -- did there come a point where you  
11 stopped working for him as a backup dancer?

12 A     That is correct.

13 Q     And after that, did you still see him on occasion?

14 A     Yes, I did.

15 Q     Until approximately when?

16 A     1998.

17 Q     Okay. Now, where did you first meet the defendant?

18 A     At his apartment.

19 Q     Do you recall where the defendant's apartment was at the  
20 time you met him?

21 A     I believe the address was 8 East 9th at Burnham Place  
22 Apartments, Chicago, Illinois, South Loop.

23 Q     And how did you end up at the defendant's apartment on  
24 that occasion?

25 A     I met him through a friend of mine named Tiffany.

Angela - direct - Shihata

3276

1 Q And did Tiffany invite you to go to the apartment?

2 A Yes, she did.

3 Q How long had you known Tiffany at that time?

4 A I had met her the day before, two days before prior.

5 Q And was Tiffany also in high school at the time?

6 A Yes, she was.

7 Q Do you know what high school she attended?

8 A Kenwood Academy, Chicago, Illinois.

9 Q And was that the same high school as you or a different  
10 high school?

11 A That was a different school.

12 Q Now, when Tiffany was in high school, what, if anything,  
13 did she want to be?

14 A Tiffany wanted to be a singer.

15 Q When Tiffany invited you to go to the defendant's  
16 apartment with her, did you initially know who the defendant  
17 was?

18 A No, I did not.

19 Q And did she explain to you who he was?

20 A Yes, she did.

21 Q And what do you recall her explaining to you?

22 A Actually, his first album had just come out and "Vibe"  
23 was the single, and she showed me the video. And I was like:  
24 Yeah, I'll go.

25 Q Now, did anyone else go to the defendant's apartment with

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Angela - direct - Shihata

3277

1 you and Tiffany at that time?

2 A Yes, they did.

3 Q And without saying their names, how many other people  
4 went to the apartment with you and Tiffany?

5 A There were two other young ladies.

6 Q And do you know whether or not they were in high school?

7 A Yes, I do. They're both in -- they both were in high  
8 school at the time.

9 Q Now, how long, if at all, had you known either of the two  
10 girls that went with you and Tiffany to the defendant's  
11 apartment, how long had you known them before you went?

12 A One of them I met the day that I met Tiffany; the other  
13 two I met the day that I went to Robert's house.

14 Q Okay. How many people -- so, it's -- just so we're  
15 clear, it's you and Tiffany that go to the apartment.

16 And then how many other people go to the apartment?

17 A There are two other young ladies that go along with us.

18 Q Okay. Now, when you and Tiffany and the two other young  
19 ladies arrive at the apartment, was there anyone at the  
20 apartment when you arrived?

21 A Yes, there was.

22 Q And when you got to the apartment, did you know anyone  
23 who was present inside the apartment when you arrived at that  
24 time?

25 A No, I did not.

Angela - direct - Shihata

3278

1 Q Did you learn any of their nicknames while you were in  
2 the apartment?

3 A Yes, I did.

4 Q And over the years that you knew the defendant, did you  
5 see these individuals again?

6 A Yes, I did, ma'am.

7 Q And did you later learn their real names?

8 A Yes, I did, ma'am.

9 Q Who do you recall was present at the apartment when you  
10 arrived that first time with Tiffany and the two other young  
11 ladies?

12 A Bruce Kelly was at the apartment. Demetrius Smith was at  
13 the apartment. Larry Hood was at the apartment.

14 Q And was the defendant at the apartment?

15 A Yes, the defendant was also at the apartment.

16 Q Now, what, if any -- what, if any, nickname did you know  
17 Demetrius Smith by?

18 A We called Demetrius Smith "Johnny."

19 Q And I am showing you Government Exhibit 6.

20 Do you recognize this person?

21 A That's Demetrius Smith.

22 THE COURT: I don't know that --

23 MS. SHIHATA: And this can be published.

24 THE COURTROOM DEPUTY: Oh, I'm sorry.

25 (Exhibit published.)

Angela - direct - Shihata

3279

1 BY MS. SHIHATA:

2 Q And you mentioned -- well, I am showing you Government  
3 Exhibit 2.

4 (Exhibit published.)

5 Q Do you recognize this person?

6 A That's BK.

7 Q And that was his nickname?

8 A That's his nickname. His government name is Bruce Kelly.

9 Q And what, if any, relation to the defendant does Bruce  
10 Kelly have?

11 A Bruce Kelly is Robert Kelly's older brother.

12 Q And you previously identified a photo of Demetrius Smith.

13 Over the years that you knew the defendant, did you  
14 learn what, if any, role Demetrius Smith had with respect to  
15 the defendant?

16 A Yes, ma'am.

17 Q And what was that?

18 A Demetrius was Robert's road manager.

19 MS. SHIHATA: I am showing the witness only what's  
20 been marked for identification as Government Exhibit 92.

21 BY MS. SHIHATA:

22 Q Do you recognize this person?

23 A Yes, I do.

24 Q And who is that?

25 A That is Larry Hood.



Angela - direct - Shihata

3280

1 MS. SHIHATA: I move to admit Government Exhibit 92.

2 MR. CANNICK: No objection.

3 THE COURT: Okay, that's in evidence.

4 (Government's Exhibit 92 was received in evidence.)

5 MS. SHIHATA: And may we publish?

6 THE COURT: Yes.

7 (Exhibit published.)

8 BY MS. SHIHATA:

9 Q And was Larry Hood also present that day, along with  
10 Bruce Kelly and Demetrius Smith, when you first went to the  
11 defendant's apartment?

12 A That is correct.

13 Q And over the years that you knew the defendant, did you  
14 learn what, if any, relationship the defendant had with Larry  
15 Hood?

16 A Yes, I did, ma'am.

17 Q And what was that?

18 A That is Robert's childhood best friend.

19 Q And at some point did you learn whether Larry Hood became  
20 employed by the City of Chicago in any capacity?

21 A Yes, ma'am.

22 Q And what capacity was that?

23 A He was a Chicago police officer.

24 Q Now, after you, Tiffany, and the two other young ladies  
25 got to the defendant's apartment that first time, what

Angela - direct - Shihata

3281

1 happened?

2 A When we arrived at the apartment, we entered the space.  
3 We sat down and we actually played Yo Mama jokes and the  
4 dozens.

5 Q And what does it mean to play the dozens?

6 A That means to signify, to talk about each other in a  
7 playful way.

8 Q Okay. Fair to say you were joking around?

9 A Yes, ma'am.

10 Q And who was participating in that?

11 A Everyone that was there at that time, ma'am.

12 Q Okay. So, the people that you identified already that  
13 were present at the apartment when you arrived, as well as you  
14 and the three other girls?

15 A That is correct, ma'am.

16 Q And do you recall about how long that went on for?

17 A Maybe an hour or so. I don't recall the exact amount of  
18 time, but a sizeable amount.

19 Q And at some point did the defendant go -- well,  
20 withdrawn.

21 Where -- do you recall where that joking around  
22 occurred, where in the apartment?

23 A In a communal space in the apartment, right across from  
24 where the kitchen is.

25 Q And at some point did the defendant go into another room

Angela - direct - Shihata

3282

1 of the apartment?

2 A Yes, he did.

3 Q And after the defendant went into another room, who, if  
4 anyone else, went into the same room as him?

5 A All of us, one by one.

6 Q And when you say "all of us," who are you referring to  
7 specifically?

8 A All of the young ladies that were in the home. None of  
9 the gentlemen moved, outside of the defendant.

10 Q Okay. And so, at some point did you go inside the room?

11 A Yes, ma'am, I did.

12 Q And do you recall how that came about?

13 A I don't recall if it was Tiffany or if it was Robert that  
14 invited me into the room, but I was asked to come into the  
15 room.

16 Q And what, if anything, did you observe once you entered  
17 the room?

18 A When I entered the room, three of the other young ladies  
19 were stationed in different spots. One of them was unrobing,  
20 the other one was standing there, and the other one was also  
21 taking off her shirt.

22 Q And when you say "unrobing," do you mean taking off her  
23 clothes?

24 A Yes, ma'am.

25 Q What, if anything, did the defendant say to you after you

Angela - direct - Shihata

3283

1 entered the room?

2 A He asked me to climb on top of him.

3 Q And what happened next?

4 A I paused for a moment. I was a little startled. I  
5 wasn't really sure what I should do, but then I did exactly  
6 what he asked me to do.

7 Q And what happened after you climbed on top of the  
8 defendant?

9 A I asked the defendant -- actually, the defendant asked me  
10 to straddle him and to ride him, and I asked him if I could  
11 grab a condom.

12 THE COURT: Could I just ask, at this point what  
13 were you wearing?

14 THE WITNESS: I had on a dress.

15 BY MS. SHIHATA:

16 Q And how old were you at this time, approximately?

17 A Between 14 and 15. It's close -- I would assume closer  
18 to 15 since it's the break between freshman and sophomore  
19 year.

20 Q And after you asked about getting a condom, what  
21 happened?

22 A The defendant said he didn't have any.

23 Q And what happened next?

24 A I said I had one.

25 Q And what, if anything, did you do?

Angela - direct - Shihata

3284

1 A I asked to get it. I don't recall if I retrieved it or I  
2 had my friend retrieve it, my bag.

3 Q Okay. And after that, what happened?

4 A After that, I proceeded to put the condom on the  
5 gentleman and then I straddled him.

6 Q And did the defendant have sexual intercourse with you  
7 that day?

8 A Yes, he did.

9 Q And was that vaginal penetration?

10 A Yes, it was.

11 Q And who, if anyone else, was in the room when that  
12 happened?

13 A Tiffany and the other two young ladies, as well.

14 Q After the defendant had intercourse with you, do you  
15 recall anything else that happened in the room that day?

16 A The defendant had intercourse with more than one of us,  
17 and there was sexual contact with all of us.

18 Q When you say "sexual contact," what do you mean?

19 A One young lady's breasts were caressed, the other young  
20 lady's breasts were suckled, and one young lady was fingered.

21 Q And was that all by the defendant?

22 A Yes, ma'am.

23 Q Now, at some point did you leave the room?

24 A We all did, ma'am.

25 Q And when you left the room, were Demetrius Smith, Bruce

Angela - direct - Shihata

3285

1 Kelly and Larry Hood still in the apartment?

2 A Yes, they were.

3 Q Now, at some point did you leave the defendant's  
4 apartment that day?

5 A Yes, we did.

6 Q By the way, do you recall around what time of day you  
7 went to the defendant's apartment?

8 A It was night, ma'am.

9 Q Now, before you left the apartment, do you recall whether  
10 the defendant said anything to you and Tiffany and the other  
11 two girls?

12 A Yes, he invited us to come back the following day.

13 Q And did you go back the following day?

14 A Yes, we did.

15 Q How often did you see the defendant after that?

16 A Every day for quite a few years.

17 Q And at what locations did you generally see him?

18 A If we weren't at the apartment, we were at CRC Recording  
19 Company in Chicago, Illinois, downtown.

20 Q And is CRC Recording Company, is that a recording studio?

21 A Yes, it is.

22 Q And do you recall where that studio's located?

23 A I believe the first address is 232, where the Apple store  
24 is located, downtown Chicago.

25 The other one is a block east of that, closer to

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Angela - direct - Shihata

3286

1 McClurg Court on the opposite side, north side of the street,  
2 and it is also Chicago Recording Company.

3 Q Okay, and you said a number 232 when you said where the  
4 Apple store is.

5 Is the location now where an Apple store is in  
6 Chicago?

7 A The location is no longer a recording studio, it is now  
8 the Apple store.

9 Q And do you remember what street, 232 of what street?

10 A It's Michigan Avenue and Eire, I believe.

11 Q Okay. And how about the other location?

12 A It's also -- actually, no, I'm wrong. That's Ohio, Ohio  
13 and -- right before you get to the lake.

14 Q Okay.

15 And who, if anyone, did you generally go to these  
16 locations with to see the defendant?

17 A Tiffany and myself were together every day, and a  
18 different assortment of young ladies on a regular basis.

19 Q Now, at some point did you stop going to school?

20 A Yes, ma'am.

21 Q And why did you stop going to school?

22 A We were given an option, we were either gonna sing or we  
23 were gonna go to school.

24 Q And who gave you that option?

25 A Robert did.

Angela - direct - Shihata

3287

1 Q What, if any, discussions do you recall having with the  
2 defendant about that?

3 A We were leaving or trying to attempt to leave one day and  
4 he was like: Where are you, guys, going?

5 And we were like: We gotta go to school tomorrow.

6 And he was like: Well, look, if you guys are gonna  
7 sing, you're gonna sing. You don't have time for school. So,  
8 you're either gonna sing or you're gonna go to school.

9 And we made a decision to sing.

10 Q Now, apart from the first time you met the defendant that  
11 you've already testified about, were there other times that  
12 the defendant had sexual intercourse with you?

13 A Yes, there was.

14 Q And do you recall on how many occasions that occurred?

15 A No, I do not.

16 Q Was it multiple occasions?

17 A Yes, it was.

18 Q And do you recall the locations where sexual intercourse  
19 with the defendant occurred?

20 A It was either at the apartment, at the studio, and there  
21 were a few times while we were on the road.

22 Q Now, other than sexual intercourse, did the defendant  
23 ever touch you in other ways?

24 A Outside of fondling , no.

25 Q Okay, but fondling was one of the ways?



Angela - direct - Shihata

3288

1 A Yes, ma'am.

2 Q Now, you testified you went -- that apartment that you  
3 initially went to when you met the defendant, you went there  
4 on multiple occasions, is that correct?

5 A Yes, ma'am.

6 Q And can you describe for the jury kind of how big of an  
7 apartment it was?

8 A It's a small apartment. If I recall correctly, there are  
9 two bedrooms, one communal space and a kitchen, and a  
10 bathroom.

11 Q Now, you testified that there were multiple occasions  
12 where you had sexual intercourse with the defendant.

13 About how old were you over the span of time that  
14 you had sexual intercourse with the defendant?

15 A Roughly, 15, 16, 17.

16 Q And did you want to have sexual intercourse with the  
17 defendant?

18 A No.

19 Q Why did you do so?

20 A Keep in mind, I just met the young ladies the day before.  
21 I wasn't sure whether or not I was getting ready to get jumped  
22 on, so...

23 Q Okay, so that's the first occasion?

24 A Yes, ma'am.

25 Q You testified you had intercourse with him again after

Angela - direct - Shihata

3289

1 that, is that right?

2 A Yes, ma'am.

3 Q Why did you do so?

4 A He told us that we had to pay our dues. It was a  
5 requirement to be around.

6

7 (Continued on the following page.)

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RMR

CRR

RPR

Angela - direct - Shihata

3290

1 BY MS. SHIHATA: (Continuing.)

2 Q Now, did the defendant ever ask you to bring other girls  
3 around?

4 A Yes, he did.

5 Q What do you recall him saying?

6 A Get me some girls or bring me some new talent.

7 Q Now, at a certain point did the defendant's sexual  
8 interactions with you become less frequent?

9 A Yes, ma'am.

10 Q And do you recall around when that happened?

11 A '92-ish going into '93.

12 Q Did there come a time when the defendant employed you?

13 A Yes, ma'am.

14 Q In what capacity?

15 A As a dancer.

16 Q And as a dancer for what?

17 A On the road for touring. We were the first set of road  
18 dancers.

19 Q And around when was that?

20 A '92.

21 Q About how old were you then?

22 A Sixteen.

23 Q Did you travel with the defendant as one of his backup  
24 dancers?

25 A Yes, I did.

Angela - direct - Shihata

3291

1 Q And how would you travel with him on the road?

2 A We traveled via tour bus.

3 Q When you were working as a backup dancer for the  
4 defendant, were you paid?

5 A Yes and no.

6 Q What do you mean by that?

7 A We were given a per diem which was an amount of money  
8 that you use for food while we were out on the road and we  
9 were given cash. Any time we were given any form of a check,  
10 it never went through.

11 Q What do you mean it never went through?

12 A It would bounce. Oak Street Bank, Chicago, Illinois.

13 Q I'm showing you what's marked as Government Exhibit 54.

14 (Exhibit published.)

15 Q Do you recognize this person?

16 A Yes, I do.

17 Q Who do you recognize this person to be?

18 A That is Aaliyah Dana Haughton.

19 Q Have you met Aaliyah in person?

20 A Yes, I have.

21 Q Is Aaliyah currently deceased?

22 A Yes, she is.

23 Q Do you know around when she passed away?

24 A Early 2000s, August 25, I believe, 2001. I could be  
25 wrong about the year.

Angela - direct - Shihata

3292

1 Q And do you know how she passed away?

2 A In a plane crash.

3 Q Around when did you first meet Aaliyah?

4 A January of 1992.

5 Q Prior to meeting Aaliyah, had the defendant spoken to you  
6 about her?

7 A Yes, he did.

8 Q What had the defendant told you about Aaliyah before you  
9 met her?

10 A That she was the next up and coming artist, the next  
11 hottest wave coming out of Detroit.

12 Q And who, if anyone, introduced you to Aaliyah?

13 A Robert did.

14 Q The defendant?

15 A Yes, ma'am.

16 Q Do you recall where you were when you first met her?

17 A CRC Studios.

18 Q And do you recall who if anyone else was there when you  
19 first met her?

20 A It was Aaliyah, it was Robert. It was also her brother  
21 Rashad and that was it.

22 Q Were any of your other friends there?

23 A Yes, ma'am.

24 Q And who was that or, well, actually, was Tiffany there?

25 A Yes, she was.

Angela - direct - Shihata

3293

1 Q And was any -- without saying the names, was anyone else  
2 there?

3 A Yes, she was.

4 Q And you mentioned someone's brother Rashad. Whose  
5 brother was that?

6 A Rashad is Aaliyah's brother.

7 Q Is that an older brother?

8 A Yes, he is.

9 Q Now, you had testified -- you testified earlier that at a  
10 certain point you stopped going to school because you were  
11 given a choice between school and singing; is that right?

12 A That is correct.

13 Q And at that point were you singing with anybody else?

14 A I don't understand the question.

15 Q Sure. Were there any other girls that you were singing  
16 with?

17 A Yes, ma'am.

18 Q And was one of those girls Tiffany?

19 A Yes, ma'am.

20 Q And was there a third person that you were singing with  
21 as well?

22 A Yes, ma'am.

23 Q Now, was it those two girls, Tiffany and the other girl,  
24 that were with you when you met Aaliyah?

25 A Yes, ma'am.

Angela - direct - Shihata

3294

1 MS. SHIHATA: I'm showing the witness only what's  
2 been marked for identification as Government Exhibit 964

3 (Exhibit published to witness only.)

4 BY MS. SHIHATA:

5 Q Do you recognize this photo?

6 A Yes, I do.

7 Q Does this photo include you, Tiffany and the third person  
8 that was in your singing group?

9 A Yes, it does.

10 Q And is that person's face blurred out, that third person?

11 A Yes, it is.

12 MS. SHIHATA: The Government offers, for the jury  
13 only, Government Exhibit 964

14 MR. CANNICK: Just one question. Are these members  
15 of the singing group or dancers?

16 THE COURT: The witness would know the answer to  
17 that?

18 THE WITNESS: Members of the singing group.

19 MR. CANNICK: No objection.

20 THE COURT: Okay.

21 (Government Exhibit 964 received in evidence.)

22 MS. SHIHATA: If we could publish to the jury only.

23 (Exhibit published for jury only.)

24 BY MS. SHIHATA:

25 Q And where I am pointing on the left of the photograph, is

Angela - direct - Shihata

3295

1 that you?

2 A Yes, it is.

3 Q And on the right of the photograph, is that Tiffany?

4 A Yes, it is.

5 Q And in the middle is the third member of the group?

6 A Yes, it is.

7 Q Now, when the three of you met Aaliyah and her brother  
8 Rashad, what, if anything, did the defendant tell Aaliyah  
9 about the three of you?

10 MR. CANNICK: Objection.

11 THE COURT: Were you present when he said something?

12 THE WITNESS: Yes, ma'am.

13 THE COURT: Okay, overruled.

14 BY MS. SHIHATA:

15 Q And what did he say?

16 A He told her that we were going to be her background just  
17 like he had Public Announcement, we were going to be her  
18 background as well.

19 Q You mentioned Public Announcement. What is that?

20 A Public Announcement is a group that used to sing  
21 background and dance with Robert as well.

22 Q And do you recall whether the defendant said anything  
23 else to Aaliyah about the three of you?

24 A He told her that we were going to give her her street  
25 vibe and that we were going to be there to be her friends as



Angela - direct - Shihata

3296

1 well.

2 Q Now, at some point around the time that you met Aaliyah,  
3 did the defendant name your girl group after that?

4 A Yes, he did.

5 Q And what did he call it?

6 A Second Chapter.

7 Q Now, do you recall anything specific about the day you  
8 met Aaliyah?

9 A It was her birthday.

10 Q And do you recall whether the defendant said anything  
11 about what birthday it was?

12 A He told us exactly how old she was going to be that year.

13 Q And to the best of your recollection, how old did you  
14 believe her to be at that time?

15 A She was 12.

16 Q Now, did you see Aaliyah again after that?

17 A Regularly, daily.

18 Q And what types of places would you see Aaliyah at?

19 A At the studio, at the hotel. We would sneak her out,  
20 take her on the train, to my dad's house. Riding all around  
21 the south side of Chicago, Tiffany and myself.

22 Q And what was Aaliyah doing in Chicago during that time  
23 period?

24 A Aaliyah was working on her first album.

25 Q And are you aware of who, if anyone, wrote and produced

Angela - direct - Shihata

3297

1 that album?

2 A Yes, I am.

3 Q And who is that?

4 A Robert.

5 Q And do you know what that album was called?

6 A *Age Ain't Nothing But a Number.*

7 Q Now, when Aaliyah was in Chicago working on her album, do  
8 you know where she stayed?

9 A At the Inn of Chicago, Best Inn of Chicago, directly  
10 across the street from CRC Studios.

11 Q And who, if anyone, came with Aaliyah to Chicago?

12 A Her mother occasionally, but she had a chaperone as well.

13 Q And did you ever meet the chaperone?

14 A Yes, I did.

15 Q Was her chaperone always around?

16 A No, she was not.

17 Q And did her older brother Rashad also travel with her  
18 sometimes as well?

19 A Yes, he did.

20 Q Was he always around?

21 A No, he was not.

22 Q Now, you testified earlier that you were employed as a  
23 backup dancer on certain tours with the defendant; is that  
24 right?

25 A That is correct.

Angela - direct - Shihata

3298

1 Q Do you recall a tour that you worked as a backup dancer  
2 on where a performer called Gerald Levert was also on tour  
3 with the defendant?

4 A Yes, I do.

5 Q To the best of your recollection around when do you  
6 recall that tour being?

7 A '93-ish.

8 Q And approximately how old were you at that time?

9 A Maybe 17.

10 Q And how --

11 A It's between '92 and '93. I'm not sure, but between  
12 those two years. So between 16 or 17.

13 Q Fair to say you are not -- sitting here today in 2021  
14 you're not sure of the exact date of that tour?

15 A That is correct.

16 Q Now, how did you travel from city to city?

17 A By tour bus.

18 Q And was there more than one tour bus traveling from city  
19 to city?

20 A Yes, there was.

21 Q Do you remember anything about the tour bus you traveled  
22 on, what it looked like?

23 A Yes, ma'am.

24 Q What do you recall about that tour bus?

25 A There are small tables and couch-like chairs in the very

Angela - direct - Shihata

3299

1 front. There are sleeping bunks that are on either side of  
2 the bus and at the very rear of the bus is the main cabin and  
3 there's also a bathroom as well.

4 Q Now, do you recall a tour stop during that tour in  
5 Washington, D.C.?

6 A Yes, I do.

7 Q And about how long were you in Washington, D.C. for that  
8 tour stop?

9 A A couple of days.

10 Q And after you got to Washington, D.C., where did you  
11 stay?

12 A I don't recall what hotel we stayed in, ma'am.

13 Q But it was at a hotel?

14 A Yes, ma'am.

15 Q And did the defendant become upset with you at any point  
16 while you were at that tour stop in D.C.?

17 A Yes, he did.

18 Q Was that once or more than once?

19 A It was more than one occasion, ma'am.

20 Q Do you recall what happened the first time he became  
21 upset with you while at that tour stop?

22 A Yes, I do, ma'am.

23 Q What do you recall about that?

24 A I recall that myself, Tiffany, Aaliyah and one of the  
25 other dancers, Gerald Levert had a swim party, a splash party

Angela - direct - Shihata

3300

1 and we went to the splash party. We were in the swimming pool  
2 and the defendant came and got us out of the pool.

3 Q And did he say anything about why he was upset?

4 A Yes, we were always instructed not to associate with  
5 other artists on the tour. He was always afraid that someone  
6 may do something --

7 MR. CANNICK: Objection.

8 Your Honor, I objected to that.

9 MS. SHIHATA: I think there was an objection, Judge.

10 THE COURT: I did not hear it. I'm sorry.

11 Well, sustain it as to the last part, he was always  
12 afraid.

13 But did he tell you not to associate with other  
14 people?

15 THE WITNESS: Yes, he did.

16 THE COURT: And did he tell you why?

17 THE WITNESS: Yes, he did.

18 THE COURT: What did he say?

19 THE WITNESS: He didn't want anybody dropping drugs  
20 on his tour bus. He always felt that people were out to get  
21 him.

22 MR. CANNICK: I withdraw my objection.

23 THE COURT: Okay.

24 BY MS. SHIHATA:

25 Q Did he say anything specific about the pool party why he

Angela - direct - Shihata

3301

1 didn't want you at the pool party?

2 A He didn't want us communicating or congregating with  
3 other artists, period.

4 Q And when you say other artists, is that any other artist  
5 or certain types of artists?

6 A Any other artist. He didn't like people looking at his  
7 girls.

8 Q Now, you mentioned that there was another time that the  
9 defendant got upset with you during that tour stop; is that  
10 right?

11 A That is correct.

12 Q And what do you recall about that second time he became  
13 upset?

14 A After he got us out of the pool, they were attending an  
15 after party for himself so --

16 Q Who is the "they" that you're referring to?

17 A Public Announcement, R. Kelly and the entourage of people  
18 that were allowed to go to the after party.

19 Q And were those people men?

20 A Yes, ma'am.

21 Q Okay, continue.

22 A We were told to stay put and not to leave the hotel or  
23 our rooms and we decided to go out for food.

24 Q And you say we were told, who is the "we" in that  
25 sentence?

Angela - direct - Shihata

3302

1 A All of us, all of the dancers including Aaliyah were told  
2 to stay put and not leave the hotel and Tiffany as well.

3 Q And what, if anything, was Aaliyah doing on this trip to  
4 D.C.?

5 A She was seeing what traveling road life was like. She  
6 was protegee. At the time she wasn't performing but she was  
7 getting her feet wet.

8 Q You said you went to get food. Do you recall where you  
9 went?

10 A We went to the 7-11.

11 Q And what happened after you went to the 7-11?

12 A We thought we were lost on our way coming back.

13 Q And what happened then?

14 A We were trying to find our way back, making a bunch of  
15 noise walking over the bridge, and we saw a group of guys. We  
16 weren't sure who they were. Aaliyah started freaking out  
17 saying we shouldn't have left. Robert told us don't leave.  
18 In the interim, we realized that it was Robert and the rest of  
19 the guys.

20 Q That was the group of guys you saw?

21 A Yes, ma'am.

22 Q And what happened after that?

23 A Once we got back to the hotel lobby, Robert told all of  
24 us we would have to put out that night.

25 Q What did you understand him to mean by "put out"?

Angela - direct - Shihata

3303

1 A It was dues time.

2 THE COURT: What does that mean, dues time?

3 THE WITNESS: When Robert tells you that you have to  
4 pay your dues, that means he wants to have sexual contact or  
5 sexual intercourse with you.

6 BY MS. SHIHATA:

7 Q Now, you testified earlier that at a certain point after  
8 you met the defendant, the frequency of your sexual  
9 interactions with him diminished; is that right?

10 A Yes, ma'am.

11 Q And while you were -- at the time that you were in D.C.  
12 the events you just described, had it been a while since the  
13 defendant had engaged with in sexual intercourse with you at  
14 that point?

15 A Sexual intercourse, yes; sexual contact, no.

16 Q Okay. And by sexual contact, what do you mean?

17 A He would still ask me to take my clothes off and dance  
18 periodically and still fondle.

19 Q Now, did you end up engaging in sexual intercourse with  
20 him that night?

21 A No, ma'am, I did not.

22 Q And what happened?

23 A He let us -- he told us that he would let us know when it  
24 was time for us to come up and when he told me to come up,  
25 when I got off the elevator before we got to the room, I said



Angela - direct - Shihata

3304

1 I wasn't doing it that time.

2 Q And how did he respond?

3 A He said he was going to send me home.

4 Q And what happened next?

5 A I told him I would call my mom and she would have me home  
6 on a private jet faster than he could get me there on a  
7 commercial plane and he responded: I was just joking.

8 Q Did you end up staying on the tour?

9 A Yes, I did.

10 Q Now, did there come a point in time when -- while you  
11 were in D.C. at that tour stop where you were playing pranks?  
12 Is that a yes?

13 A Yes, ma'am.

14 Q And were you playing pranks by yourself or with someone  
15 else?

16 A I was playing pranks with someone else.

17 Q Okay. And what kind of pranks were you playing at that  
18 time?

19 A On that particular day we were tossing water.

20 Q Can you explain what you mean by that?

21 A Should I start with how the game starts --

22 Q Well, let's start --

23 A -- or that specific day?

24 THE COURT: What do you mean by tossing water, water  
25 balloons?

Angela - direct - Shihata

3305

1 THE WITNESS: No just water out of a cup or the ice  
2 buckets from the hotel.

3 THE COURT: Go ahead.

4 BY MS. SHIHATA:

5 Q What happened that day with respect to the prank playing  
6 and the water?

7 A Well, we had a game that we would play on the bus called  
8 All Out GD Fucking. And that was like a truth or dare.  
9 Somebody would dare you to do something crazy or you would  
10 have to tell the truth, but the name that Robert gave it was  
11 All Out GD Fucking. And so this particular day we were going  
12 to get them back. Robert has a thing where he likes to play  
13 jokes. He'll put salt or pepper in your nose or your mouth or  
14 put your hand in warm water so you pee on yourself, things  
15 like that.

16 And so this particular day we were going to get the  
17 guys back. And so we started at the hotel and we started with  
18 Public Announcement having the maids open their doors and  
19 tossing water into their rooms.

20 Q And at some point you decide to continue this game or  
21 this prank playing on the tour bus?

22 A Yes, we did. We were in the process of getting ready to  
23 leave for a show and people were moving about, in and out of  
24 bus, and we got wind that Robert was in his quadrant and we  
25 were going to go and toss water on him.

Angela - direct - Shihata

3306

1 Q And when you say his quadrant, what are you referring to?

2 A There's a main cabin at the rear of the bus where he  
3 slept.

4 Q And what, if anything, happened after you got on the bus?

5 A I proceeded to the rear of the cabin. I slightly opened  
6 the door and saw --

7 Q Which door did you open?

8 A The door to the main cabin.

9 Q And what, if anything, did you see after you opened that  
10 door?

11 A I saw Robert and Aaliyah in a sexual situation.

12 Q And what specifically did you see?

13 A It appeared that he had his head up in between her legs  
14 and was giving her oral sex.

15 Q And do you recall where in the room that was when that  
16 was happening?

17 A There's a small portion that you can sit on and that's  
18 where she was sitting. Just like a little couch thing. It's  
19 a small sitting area. I don't know if you would call it a  
20 couch.

21 Q And how was Aaliyah seated on the couch?

22 A She was seated with her legs open.

23 Q Was she seated upright?

24 A Upright, yes, ma'am.

25 Q And where did you see the defendant?

Angela - direct - Shihata

3307

1 A On his knees, ma'am.

2 Q And where was his head?

3 A In between her legs.

4 Q In her vaginal area?

5 A That's what it appeared to me, ma'am.

6 Q What did you do after seeing that?

7 A I closed the door abruptly and pushed the other girl  
8 behind me away from the door.

9 Q Now, prior to that date, did you know that the defendant  
10 was engaged sexually with Aaliyah?

11 MR. CANNICK: Objection?

12 PROSPECTIVE JUROR: No, I did not.

13 THE COURT: Overruled.

14 BY MS. SHIHATA:

15 Q Did you ever talk to the defendant about what you saw  
16 that day?

17 A No, I did not.

18 Q At some point did you stop working as a dancer for the  
19 defendant?

20 A Yes, I did.

21 Q And around when was that?

22 A Right before the Download Tour.

23 Q Do you recall around when that was?

24 A Mid-'90s. I'm not certain what year.

25 Q After you stopped working as a dancer for the defendant,

Angela - direct - Shihata

3308

1 did you continue to work with any other artists that were  
2 affiliated with him after that?

3 A Yes, I did.

4 Q Which artist did you work with?

5 A I danced for Sparkle.

6 Q You were a dancer for an artist named Sparkle?

7 A Yes, ma'am.

8 Q And in that capacity did you sometimes continue to see  
9 the defendant?

10 A Yes, I did.

11 Q At what types of locations?

12 A In passing, the studio.

13 Q Are you familiar with a docuseries called *Surviving*  
14 *R. Kelly*?

15 A Yes, I am.

16 Q Did you participate in that docuseries?

17 A Yes, I did.

18 Q What, if anything, did you provide to the producers of  
19 that docuseries?

20 A Photographs only.

21 Q What types of photographs did you provide?

22 A Of me during that time period.

23 Q And what, if anything, did you receive for those -- for  
24 the use of those photographs?

25 A I don't recall the amount.

Angela - direct - Shihata

3309

1 Q Did you receive money?

2 A Yes, I did.

3 Q You don't recall about how much?

4 A I don't recall the exact amount.

5 Q Do you have an estimate of how much?

6 A A few grand.

7 Q Did you talk about Aaliyah on *Surviving R. Kelly*?

8 A Yes, I did.

9 Q And did you talk about the defendant having sex with you  
10 as a minor on the docuseries?

11 A No, I did not.

12 Q Why not?

13 MR. CANNICK: Objection.

14 THE COURT: Overruled?

15 PROSPECTIVE JUROR: I was embarrassed. I never  
16 wanted anyone to know that I had been in that situation at  
17 all.

18 Q Now, during the course of time that you knew and spent  
19 time with the defendant what, if anything, did he say about  
20 protecting him?

21 A We were taught from day one to protect Robert and that  
22 people were always out to get him. So from day one we were  
23 told to make sure that we protected him.

24 MS. SHIHATA: One moment, Your Honor.

25 Nothing further.

Angela - cross - Cannick

3310

1 THE COURT: Cross-examination?

2 MR. CANNICK: Yes, briefly, Your Honor.

3 CROSS-EXAMINATION

4 BY MR. CANNICK:

5 Q What year was it that you were hired to be a dancer for  
6 Robert?

7 A 1992.

8 Q And how old were you then?

9 A 16, roughly.

10 Q And who hired you?

11 A Robert.

12 Q Did you have a contract?

13 A No.

14 Q You went on the road with him?

15 A Yes, I did.

16 Q And did you perform in any videos with him?

17 A Yes, I have.

18 Q So then if we were to look we would find your name on the  
19 credit side of these performances; am I correct?

20 A No, you would not.

21 Q We would not. We would not because you didn't do it;  
22 right?

23 A That's incorrect, sir.

24 Q So you are telling us that you performed with him on  
25 videos but we would not see you receiving any credit for it on

Angela - cross - Cannick

3311

1 the video label?

2 A I don't know if tour dancers get credits on concerts that  
3 are recorded that people perform in.

4 Q I didn't ask you about concerts. You testified and told  
5 us just a short while ago that you performed on videos with  
6 him.

7 A Perhaps maybe I didn't understand you. When you say  
8 video do you mean a music video or do you mean being in a  
9 concert and those videos being recorded and then replayed?

10 Q Ma'am --

11 THE COURT: Can you clarify that question?

12 A Please.

13 Q Ma'am, when you think of a music video what do you think  
14 of?

15 MS. SHIHATA: Objection.

16 THE COURT: Sustained.

17 Just clarify what the difference is.

18 Were you ever on a video like on MTV, a non-concert  
19 video?

20 THE WITNESS: No.

21 BY MR. CANNICK:

22 Q On those videos are dancers; correct?

23 A The majority of his music videos in the early 90s didn't  
24 have dancers in the videos.

25 THE COURT: Just do your best to answer the question



Angela - cross - Cannick

3312

1 that he's asking?

2 PROSPECTIVE JUROR: I'm sorry, sir.

3 THE COURT: Just put the question again.

4 BY MR. CANNICK:

5 Q I'm not asking about the majority. On the video there  
6 are dancers; am I correct?

7 A Well, that would be a two-part question, sir. A part of  
8 that would be yes and a part of that would be no. Some videos  
9 have dancers and some videos do not.

10 Q So, now where was it that you would perform with Robert?

11 A I was a tour dancer, sir, over several states.

12 Q Again, my question is -- withdrawn.

13 Did you perform with him in arenas?

14 A Yes. Let me ask you, are theaters and arenas the same  
15 thing, sir, so I have clarity.

16 THE COURT: If you don't want to clarify, don't.

17 BY MR. CANNICK:

18 Q Tell us the venues that you performed in with him.

19 A Sir, you just asked me that --

20 Q The venues.

21 THE COURT: He didn't say videos?

22 PROSPECTIVE JUROR: I don't recall the names of the  
23 venues. That was 25 years ago. Chicago Theater is one.

24 That's because I'm from Chicago and it was a really big deal

25 that he was at the Chicago Theater and we were excited to be

Angela - cross - Cannick

3313

1 there.

2 Q I'm sure you were excited to be at the other venues as  
3 well; correct?

4 A Yes, but I don't recall the names of the venues, sir. I  
5 do apologize.

6 Q You said you performed with him in D.C., do you remember  
7 telling us that?

8 A That is correct.

9 Q What kind of venue was it in D.C.?

10 A We did several different things, even a high school.

11 Q Again, when you said you did several types of things, did  
12 you perform in arenas?

13 A We performed in arenas, we performed in high schools.  
14 We've performed in gyms.

15 Q Did you perform in a nightclub?

16 A No, sir we did not.

17 Q And when you say you performed in an arena, did you have  
18 a recollection as to which arena?

19 A No, sir, I do not.

20 Q And do you recall performing in arenas that had -- where  
21 they also played basketball?

22 A That's correct and I also remember the Ohio State Fair.

23 Q Now, the arenas that you performed in, you were still 15,  
24 16 years old when you were performing?

25 A That is correct, sir.

Angela - cross - Cannick

3314

1 Q And the arenas had no age requirements for performers?

2 A I wouldn't be aware of that, sir.

3 Q Well, you do know that Aaliyah was not allowed to perform  
4 in certain arenas because of her age; correct?

5 MS. SHIHATA: Objection.

6 THE COURT: Sustained as to form.

7 Q Were you aware that Aaliyah wasn't able to perform in  
8 certain arenas with Robert because of her age?

9 A I think I specified earlier --

10 Q I --

11 THE COURT: Mr. Cannick.

12 The question is do you know whether or not she was  
13 prohibited from performing because of her age.

14 THE WITNESS: I do not.

15 BY MR. CANNICK:

16 Q Are you aware that arenas have age requirements that  
17 underage folks are not allowed to perform?

18 A I wouldn't be aware of that, sir.

19 Q Now, when did you hire a lawyer?

20 A Last year, sir.

21 Q And when was it that you were engaged by *Surviving*  
22 *R. Kelly*?

23 A That was in 2018, sir.

24 Q And you testified and told us that on that show where you  
25 were paid money to provide photographs, you did not tell

Angela - redirect - Shihata

3315

1 anyone on that show that Robert Kelly assaulted you sexually?

2 A That is correct, sir.

3 MR. CANNICK: Nothing further.

4 THE COURT: Any redirect?

5 MS. SHIHATA: Just briefly, Your Honor.

6 THE COURT: Okay.

7 REDIRECT EXAMINATION

8 BY MS. SHIHATA:

9 Q Have you been asked in other media outlets whether  
10 anything occurred between you and Robert Kelly sexually?

11 A Yes, I have, sir -- I mean, ma'am. I'm sorry.

12 MR. CANNICK: Objection.

13 Q And how if at all did you respond on those occasions?

14 MR. CANNICK: Objection.

15 THE COURT: Could I see the parties at the side just  
16 for a moment, please?

17 (Sidebar held outside of the hearing of the jury.)

18 (Continued on next page.)

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Sidebar

3316

1 (The following sidebar took place outside the  
2 hearing of the jury.)

3 THE COURT: What is your objection?

4 MR. CANNICK: It's beyond the scope of cross. She  
5 asked specifically about *Surviving R. Kelly* and I asked very  
6 specifically about what -- my question only pertained to  
7 *Surviving R. Kelly* and what her response was and that was in  
8 direct relationship to a question that was asked of her on  
9 direct.

10 THE COURT: What is your answer to that?

11 MS. SHIHATA: He clearly ended on that question.  
12 It's beyond the scope. He's making it seem like she has never  
13 said anything prior to today. I think her response will be  
14 when she was directly asked that question by another media  
15 outlet she said that is not something I want to discuss. That  
16 is consistent and he opened the door by asking this question.

17 MS. SHIHATA: I'm allowed redirect

18 THE COURT: It's certainly related to the topic. At  
19 least in my view. Certainly part of it was directed for  
20 undercutting her credibility. Correct so far?

21 MR. CANNICK: Correct.

22 THE COURT: And part of it was leaving the jury with  
23 the impression that she's never said anything to anybody about  
24 it.

25 MR. CANNICK: She still hasn't.

Sidebar

3317

1 MS. SHIHATA: There's a difference between nothing  
2 happened and I don't want to talk about it.

3 THE COURT: I am going to permit the question.

4 (Sidebar ends.)

5 (Continued on next page.)  
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OCR

RPR

Angela - redirect - Shihata

3318

1 BY MS. SHIHATA:

2 THE COURT: The objection is overruled go ahead.

3 BY MR. CANNICK:

4 Q So when you were asked in the media directly whether  
5 anything happened sexually happened between you and the  
6 defendant how if at all did you respond?

7 A There were things that had occurred that I chose not to  
8 discuss at that time.

9 Q And that's how you responded?

10 A Yes, ma'am.

11 MS. SHIHATA: Nothing further.

12 THE COURT: Anything else?

13 MR. CANNICK: Nothing.

14 THE COURT: Thank you so much. You can step down.

15 And then are you ready to call another witness?

16 MS. CRUZ MELENDEZ: We are, Your Honor.

17 THE COURT: And who is that.

18 MS. CRUZ MELENDEZ: Jerie Ortez.

19 MR. CANNICK: Your Honor, may we speak at sidebar,  
20 please.

21 THE COURT: Yes.

22 (Sidebar held outside of the hearing of the jury.)

23 (Continued on next page.)

24

25

Sidebar

3319

1 (The following sidebar took place outside the  
2 hearing of the jury.)

3 MR. CANNICK: The Government asked us to enter into  
4 a stipulation. We entered into a stipulation but I thought  
5 that's why we entered the stipulation, to obviate the need for  
6 this witness and if we did, this would be wholly cumulative.

7 MS. CRUZ MELENDEZ: There were two witnesses that  
8 would testify to prior consistent statements regarding Sonia,  
9 one was Charity Torres who we provided the stipulation for and  
10 the other is Jerie Ortiz who had already traveled and was  
11 here.

12 MR. CANNICK: It doesn't matter to me.

13 THE COURT: Why don't you stipulate.

14 MS. CRUZ MELENDEZ: I don't have language. What I  
15 don't want to have happen is -- and I am happy to do that, is  
16 what I don't want to have happen is we fly her back home and  
17 then they say they're unwilling to stipulate.

18 THE COURT: I am going to excuse the jury for ten  
19 minutes. If you can work out a stipulation that's fine. But  
20 if not that's also fine.

21 (Sidebar ends.)

22 (Continued on next page.)

23

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OCR

RPR



Proceedings

3320

1 THE COURT: Ladies and gentlemen, I think this is  
2 going to speed things along. I am going to excuse you for  
3 just ten minutes or so while we work this out and this will  
4 move things along. So don't talk about the case at all, but I  
5 will see you in a few minutes.

6 (Jury exits.)

7 THE COURT: Everybody have a seat. Take this time  
8 and see if you can work out a stipulation with respect to this  
9 witness. Thank you so much.

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11 (Continued on the following page.)

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Proceedings

3321

1 (In open court; outside the presence of the jury.)

2 THE COURTROOM DEPUTY: All rise.

3 THE COURT: Everybody can sit down.

4 (Pause in proceedings.)

5 MS. CRUZ MELENDEZ: We have got the stipulation.

6 We'll print out a copy of it. But I think we're in  
7 agreement.

8 THE COURT: Oh, great. So are you going to call  
9 another witness, then?

10 MS. CRUZ MELENDEZ: Yes, we are, Your Honor.

11 MS. SHIHATA: The Government is going to call  
12 Alex.

13 THE COURT: So if you want to just go get the  
14 witness, and Ms. Shihata, just let me know where I should  
15 be.

16 (Pause in proceedings.)

17 THE COURT: I'm sorry, Ms. Shihata?

18 MS. SHIHATA: Yes.

19 (Pause in proceedings.)

20 THE COURTROOM DEPUTY: All rise.

21 (Jury enters the courtroom.)

22 (Jury present.)

23 THE COURTROOM DEPUTY: You may be seated.

24 THE COURT: All right. Well, so that was a very  
25 productive break. The parties have agreed to stipulate to

Proceedings

3322

1 some evidence, but they're going to call a different witness  
2 now.

3 Go ahead.

4 MS. SHIHATA: The Government calls Alex.

5 THE COURTROOM DEPUTY: Please stand and raise your  
6 right hand.

7 **A L E X,**

8 called as a witness having been first duly  
9 sworn/affirmed, was examined and testified as  
10 follows:

11 THE COURTROOM DEPUTY: You may be seated.

12 THE COURT: You can remove your mask.

13 So a couple of things: I want to make sure the  
14 microphone is working. Will you just give it a tap.

15 THE WITNESS: All right.

16 THE COURT: There's a button on the top, maybe...  
17 (Pause in proceedings.)

18 THE COURT: Try it again. Just speak into it.  
19 (Pause in proceedings.)

20 THE COURT: Okay. So just a couple of things:  
21 First of all, I want to make sure that everybody can hear  
22 you.

23 THE WITNESS: Hello.

24 THE COURT: Okay. Good.

25 All right. So speak into the microphone. Our

Alex - Direct - Shihata

3323

1 court reporter is taking down everything that you say.

2 THE WITNESS: Okay.

3 THE COURT: So I actually think it's easier just  
4 to hold onto it. Yeah. Then you won't have to keep leaning  
5 in. But the court reporter takes down everything that you  
6 say, so try not to speak too quickly. I want to make sure  
7 he can get it all.

8 If there is a question that you don't understand  
9 or that you want repeated, just let me know and I'll have  
10 the lawyers rephrase. Just do your best to answer what best  
11 answers the particular question that you're being asked.

12 Okay.

13 THE WITNESS: Yes.

14 THE COURT: All right. Go ahead.

15 DIRECT EXAMINATION BY

16 BY MS. SHIHATA:

17 Q Good afternoon.

18 A Good afternoon.

19 Q I'm showing you what's in evidence as  
20 Government's Exhibit 68.

21 Do you recognize the person in this photograph?

22 A Yes.

23 Q And who is this is photograph of?

24 A Myself.

25 MS. SHIHATA: I'm showing the witness only what's

Alex - Direct - Shihata

3324

1     been marked for identification as Government's Exhibit 68 A.

2     Q     Is this is the same photograph of you with your true  
3     first and last name?

4     A     Yes, it is.

5             MS. SHIHATA: I move to admit  
6     Government's Exhibit 68A to the jury only.

7             THE COURT: Any objection?

8             MR. CANNICK: None.

9             THE COURT: Okay. That's in evidence.

10            (Government's Exhibit 68A marked and received in  
11     evidence.)

12            MS. SHIHATA: And may we publish it the jury only?

13            (Exhibit published.)

14     Q     Now, for purposes of your testimony here today, we're  
15     going to refer to you as Alex, okay?

16     A     Yes.

17     Q     I'm showing you what's been marked for identification  
18     as Government's Exhibit 68B. Is this the same photograph  
19     with your name, Alex, underneath?

20     A     Yes.

21            MS. SHIHATA: I move to admit Government Exhibit  
22     68B.

23            MR. CANNICK: No objection.

24            THE COURT: Okay. It's in evidence.

25            (Government's Exhibit 68B marked and received in

Alex - Direct - Shihata

3325

1 evidence.)

2 MS. SHIHATA: And may we publish it?

3 THE COURT: Yes.

4 (Exhibit published.)

5 (Pause in proceedings.)

6 THE COURT: Okay. Go ahead.

7 MS. SHIHATA: Thank you.

8 BY MS. SHIHATA:

9 Q How old are you?

10 A Thirty-one.

11 Q And when were you born?

12 A 2/13/90.

13 Q Is that February 13th, 1990?

14 A Yes, ma'am.

15 Q And in what neighborhood did you grow up?

16 A In the south suburbs of Chicago.

17 Q What neighborhood was that?

18 A Hazel crest.

19 Q Now, where did you go to high school?

20 A Hillcrest High School.

21 Q And when did you graduate from Hillcrest High School?

22 A 2008.

23 Q And after high school, did you continue your education?

24 A Yes, some college.

25 Q And after college -- after high school and some

Alex - Direct - Shihata

3326

1 college, did you work?

2 A Yes.

3 Q What kind of work did you do?

4 A After high school, I immediately -- I was working at  
5 McDonald's after high school.

6 Q And do you recall where the McDonald's that you worked  
7 at was?

8 A Markham, Illinois.

9 Q Now, are you currently employed?

10 A Yes.

11 Q What kind of work do you do?

12 A Construction.

13 Q And do you also have your own business?

14 A Yes.

15 Q What kind of business?

16 A Clothing line.

17 Q I'm showing you what's in evidence as  
18 Government's Exhibit 1. Do you recognize this person?

19 A Yes.

20 Q Who do you recognize this to be?

21 A Mr. Kelly.

22 Q Do you know his full name?

23 A Robert Sylvester Kelly.

24 Q And have you met Robert Kelly before?

25 A Yes.

Alex - Direct - Shihata

3327

1 Q Do you see him in the courtroom here today?

2 A Yes.

3 Q And can you please point him out and identify by an  
4 article of clothing he's wearing?

5 A White -- oh, right there (indicate), in the gray.

6 THE COURT: Indicating.

7 Q Now, what stage in your life were you in when you first  
8 met the defendant?

9 A I was a teenager in high school.

10 Q And approximately how old were you when you first met  
11 him?

12 A Approximately 16.

13 Q What grade were you in in high school?

14 A When I met the defendant? A junior.

15 Q And apart from here today in the courtroom,  
16 approximately when was the last time you saw the defendant?

17 A 2019.

18 Q Now, do you recall where you were when you first met  
19 the defendant when you were a junior in high school?

20 A Yes. At a party at his resident in Olympia Fields.

21 Q And over the years, did you go to the defendant's  
22 Olympia Fields residence multiple times?

23 A Yes.

24 Q I'm showing you what's in evidence as  
25 Government's Exhibit 502A. Do you recognize this?



Alex - Direct - Shihata

3328

1 A Yes.

2 Q What is this?

3 A The gates of the Olympia Fields residence of Mr. Kelly.

4 Q Is this is gate to enter the residence?

5 A Yes.

6 Q Now, over the years, approximately how many parties did  
7 you attend at the defendant's Olympia Fields residence?

8 A Upwards of, like, nine.

9 Q Now, you testified you first met the defendant at the  
10 party at the Olympia Fields residence. Without saying the  
11 person's name, did you go with someone to that party?

12 A Yes, my best friend at that time.

13 Q I'm showing you what's in evidence as  
14 Government's Exhibit 64. Do you recognize this person?

15 A Yes.

16 Q And without saying his full name, do you know his full  
17 name?

18 A Yes.

19 Q I'm showing the jury only what's in evidence as  
20 Government's Exhibit 64A.

21 Is this is same photograph with this individual's  
22 full name written underneath.

23 A Correct.

24 Q Now, for purposes of your testimony here today, we're  
25 going to refer to the individual in the photograph that I

Alex - Direct - Shihata

3329

1 just showed you as Louis. Okay?

2 A Yes.

3 Q And now I'm showing you what's in evidence -- I'm  
4 showing everyone what's in evidence as  
5 Government's Exhibit 64B. Is this the same photograph with  
6 the name Louis underneath?

7 A Yes.

8 Q Now, you testified that you went with your best friend  
9 at the time to the party where you first met the defendant  
10 at Olympia Fields; is that right?

11 A Correct.

12 Q And was Louis your best friend at that time?

13 A Yes.

14 Q And did you live in the same neighborhood?

15 A Yes.

16 Q And did you go to high school together?

17 A Yes.

18 Q Was Louis the same age as you?

19 A One year older.

20 Q And was he in the same class as you in high school?

21 A No, one year above me.

22 Q So when you were a junior, he was a senior?

23 A Correct.

24 Q How was it that you ended up going to the party at the  
25 Olympia Fields residence with Louis?

Alex - Direct - Shihata

3330

1 A Louis got invited and he invited me also to come with  
2 him.

3 Q Did you understand that Louis had already met the  
4 defendant before you?

5 A Correct.

6 Q And where did Louis work where you guys were in high  
7 school?

8 A McDonald's.

9 Q Do you recall which McDonald's he worked at?

10 A Markham, Illinois.

11 Q And what, if any, understanding did you have about how  
12 Louis had met the defendant?

13 A Through a drive through at McDonald's.

14 Q At which McDonald's?

15 A In Markham.

16 Q Where Louis was working?

17 A Yes.

18 Q I'm showing you Government's Exhibit 522A and 522B. Do  
19 you recognize these photos?

20 A Yes. It's the McDonald's in Markham.

21 Q And is that the McDonald's that Louis worked at --

22 A Yes.

23 Q -- when you were in high school?

24 A Yes, that's correct.

25 Q Now, you testified earlier that you recall first

Alex - Direct - Shihata

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1 meeting the defendant at the party at Olympia Fields when  
2 you were 16 during your junior year of high school. Do you  
3 recall approximately what time of year it was when you  
4 attended that first party?

5 A Around 2007, Januaryish.

6 Q And your birthday is in February, correct?

7 A Correct.

8 Q Now, when you got to the defendant's residence at  
9 Olympia Fields -- well, actually withdrawn.

10 Do you recall how you got to the residence for the  
11 party that first time?

12 A My best friend at that time.

13 Q Okay. And what happened when you were -- how did you  
14 physically get in the party, if you recall?

15 A We had to go to a Holiday Inn and get shuttled over to  
16 the party.

17 Q A shuttle, is that what you say?

18 A Yes.

19 Q Okay. And what do you mean by shuttle?

20 A Well, we go to the Holiday Inn and just tell them -- we  
21 all get on the shuttle to the -- to the residence of  
22 Mr. Kelly's.

23 Q So was that just a bus transporting people --

24 A Correct.

25 Q -- from the hotel nearby to the residence?

Alex - Direct - Shihata

3332

1 A Yes.

2 Q And after you got to the residence, what, if anything,  
3 happened?

4 A Just -- just a live party.

5 Q Okay. And did you have to go through any security or  
6 anything before you got in?

7 A Yes? Around the side there, they was doing waivers and  
8 checking ID's.

9 Q And did anyone check your ID?

10 A No.

11 Q Did anyone ask you to sign a waiver?

12 A No.

13 Q Did you see that happen to others?

14 A Yes.

15 Q Now, once you got to the party, what was the atmosphere  
16 like?

17 A It was -- it was real nice, nice music, good time,  
18 people was dancing, you know...

19 Q And was any alcohol being served?

20 A Yes.

21 Q And what was the gender makeup of the party?

22 A 98 percent women, 2 percent men.

23 Q Now, at that first party, did you speak to the  
24 defendant at that party?

25 A Just a casual, brief greet.

Alex - Direct - Shihata

3333

1 Q And how did that come about?

2 A My best friend at the time introducing me.

3 Q Louis?

4 A Yes.

5 Q And how long was that interaction with the defendant?

6 A Very brief, it was very brief.

7 Q After that first party, did you attend other parties at  
8 Olympia Fields?

9 A Yes, I have.

10 Q And what kinds of parties did you attend at the  
11 defendant's Olympia Fields residence?

12 A Album release; party birthday parties; regular  
13 Saturday, Friday night parties.

14 Q And when you say "birthday parties," for whose  
15 birthday?

16 A Mr. Kelly.

17 Q The defendant?

18 A Yes.

19 Q And who, if anyone, do you recall attending those  
20 parties with?

21 A My best friend, Louis.

22 Q Louis?

23 A Uh-huh.

24 Q You mentioned album release parties. Do you recall any  
25 specific album release party you attended at Olympia Fields?

Alex - Direct - Shihata

3334

1 A Double Up album release party.

2 Q And was that the defendant's album. Double Up?

3 A Yes.

4 Q And approximately when did you attend the Double Up  
5 album release party?

6 A The spring of 20 -- 2007.

7 Q And were you still a junior in high school at that  
8 time?

9 A Yes -- yes, going to be -- yeah, going into my senior  
10 year. But I was still a junior, yes.

11 Q So it was toward the end of your junior year?

12 A Yes.

13 Q And do you recall speaking with the defendant at that  
14 party?

15 A Yes.

16 Q What, if anything, do you recall about that  
17 conversation with the defendant?

18 A He slipped me his number.

19 Q And how did he slip you his number?

20 A Just a balled up piece of paper in his hand and he slap  
21 it in my hand.

22 Q And at some point did you look at what was on the piece  
23 of paper?

24 A Correct.

25 Q And what was on the piece of paper?

Alex - Direct - Shihata

3335

1 A His phone number.

2 Q And how was it written?

3 A It was handwritten.

4 Q Handwritten?

5 A Yes.

6 Q Did you have a cell phone when you were in high school?

7 A Yes.

8 Q And was your cell phone in your name or someone else's  
9 name?

10 A My brother-in-law's name.

11 Q And without saying his name, do you recall your  
12 brother-in-law's name?

13 A Yes, correct.

14 Q I'm showing you what's been marked for identification  
15 at Government's Exhibit 969. Do you recognize this?

16 A Yes.

17 Q Is that your brother-in-law's name?

18 A Correct.

19 MS. SHIHATA: I move to admit  
20 Government's Exhibit 969.

21 MR. CANNICK: Not a problem.

22 THE COURT: Okay.

23 (Government's Exhibit 969 marked and received in  
24 evidence.)

25 MS. SHIHATA: And may we publish it to the jury



Alex - Direct - Shihata

3336

1 only?

2 (Exhibit published.)

3 Q And your sister -- when you were in high school was  
4 this person your brother-in-law already or was he seeing  
5 your sibling?

6 A I believe they was married already.

7 Q Okay. And was he married to your sister?

8 A Correct.

9 Q Now, did your brother-in-law know the defendant  
10 personally?

11 MR. CANNICK: Objection.

12 A No.

13 THE COURT: Overruled.

14 Q Did your sister know the defendant personally?

15 A No.

16 Q Now, when the defendant -- I'm sorry. Withdrawn.

17 When the defendant gave you his phone number, I  
18 think you testified you were toward the end of your junior  
19 year in high school, correct?

20 A Correct.

21 Q And at that time, how did the defendant giving you his  
22 phone number make you feel?

23 A Feel pretty good, you know, getting a number from a  
24 celebrity, you know, his status, it made me feel really  
25 good.

Alex - Direct - Shihata

3337

1 Q Now, after the defendant gave you his phone number, at  
2 some point did you communicate with the defendant by phone?

3 A Yes.

4 Q In what manner?

5 A He just wanted to -- he just wanted me to keep in  
6 contact with him, so -- through texts, you know, just --

7 Q Okay.

8 A -- just make sure I -- you know, just check up on me.

9 Q He would check up on your?

10 A Yeah.

11 Q And you said that was mainly through texts; is that  
12 right?

13 A Yeah. And I would check up on him. We would also  
14 check up on each other.

15 Q Now, other than seeing the defendant at parties at his  
16 residence in the Olympia Fields, did you also see him at  
17 other times?

18 A Yes.

19 Q And what other places did you see the defendant in?  
20 And let me ask you it this way: When you were -- when he  
21 was still living at Olympia Fields, what other places would  
22 you see the defendant?

23 A At he residence or at the rec center where he plays  
24 ball. Around that time, that was pretty much it.

25 Q Okay. And when you say "ball," do you mean basketball?

Alex - Direct - Shihata

3338

1 A Yes.

2 Q And do you recall where the rec center was where the  
3 defendant played basketball when he was living in  
4 Olympia Fields?

5 A Markham, Illinois.

6 Q And did you attend those basketball games?

7 A Correct.

8 Q And about how far was the Markham Rec Center where the  
9 defendant played basketball from his -- from the defendant's  
10 house in Olympia Fields?

11 A No less than five other ten minutes.

12 Q Okay. And is that driving?

13 A Yes, just straight shot.

14 Q Now I'm showing you Government's Exhibits 523 -- what's  
15 in evidence Government's Exhibit 523 A, B and C. Do you  
16 recognize these photographs?

17 A Yes, that's the rec center in Markham.

18 Q Where the defendant played basketball?

19 A Correct.

20 Q And how often -- about how many times did you attend  
21 basketball games at that rec center where the defendant was  
22 playing?

23 A Two or three times.

24 Q And did you ever play during any of those basketball  
25 games?

Alex - Direct - Shihata

3339

1 A Not there. I played once with him before, but not at  
2 that one.

3 Q At a different location?

4 A Yes.

5 Q After he left Olympia Fields, did you also see the  
6 defendant play basketball somewhere else?

7 A Yeah. He used to play at a church in the city of  
8 Chicago.

9 (Pause in proceedings.)

10 MS. SHIHATA: I'm sorry. My watch just started  
11 speaking to me. I apologize.

12 THE COURT: All right.

13 Q I'm sorry. Where else did you see --

14 A At a church in the city of Chicago.

15 Q And was there a basketball court there?

16 A Yes.

17 Q And did you see the defendant play basketball multiple  
18 times there?

19 A Yes.

20 Q And I think you testified is that where you also played  
21 in one basketball game?

22 A Yes.

23 Q And how did you generally learn about the basketball  
24 games when they were played at the Markham Rec Center?

25 A My best friend Louis at the time.

Alex - Direct - Shihata

3340

1 Q He would let you know about them?

2 A Yes, he would go play.

3 Q And what were these basketball games like?

4 A Pretty much Kelly ball. You get the rebound, pass it  
5 to him, let him shoot.

6 Q And you called that Kelly ball; is that what you called  
7 it?

8 A Yes.

9 Q Okay. Now, other than you, what other types of people  
10 did you see who attended the defendant's basketball game?

11 A You had the regular ongoing watchers. You had the  
12 hoopers that got invited. And you had, you know, his  
13 ladies, his lady friends, you would have.

14 Q And when you say "the hoopers that got invited," do you  
15 mean other players?

16 A Yes.

17 Q And you said you also saw ladies there; is that right?

18 A Yeah, his lady friends.

19 Q Do you mean the defendant's?

20 A Yes.

21 Q From where, if anywhere, did you see the defendant's  
22 female friends watch the games?

23 A Apart from everyone else.

24 Q Apart from everyone else; is that what you said?

25 A Yes, correct.

Alex - Direct - Shihata

3341

1 Q And was everyone, when you were there, at least, were  
2 those men?

3 A Yes.

4 Q Now, during those earlier days when the defendant still  
5 lived at Olympia Fields when you would go to the parties at  
6 Olympia Fields and basketball games in Markham, did you see  
7 or meet any of the defendant's employees or associates?

8 A Yes.

9 Q I'm showing you what's in evidence as  
10 Government's Exhibit 4. Do you recognize this person?

11 A Yes.

12 Q Who is this?

13 A I think they call him "June Bug."

14 Q And do you know what, if any, role "June Bug" had with  
15 the defendant?

16 A Personal assistant, you know, someone like his  
17 right-hand guy for different matters.

18 Q I'm showing you Government's Exhibit 31. Do you  
19 recognize this person?

20 A Yes. I believe his name is Tom, I'm not sure. He was  
21 an assistant for Mr. Kelly.

22 Q I'm showing you what's in evidence as  
23 Government's Exhibit 21. Do you recognize this person?

24 A Yes.

25 Q Who is that?

Alex - Direct - Shihata

3342

1 A They called him Bowden.

2 Q And what, if any, role did he have with the defendant?

3 A Just longtime friend, good friend of Mr. Kelly's.

4 Q I'm showing you Government's Exhibit 9. Do you  
5 recognize this person?

6 A I've seen him before.

7 Q Do you know his name or nickname?

8 A No, I don't.

9 Q Where do you recall seeing this person?

10 A At the earlier days at parties at Olympia Fields.

11 Q I'm showing you Government's Exhibit 22. Do you  
12 recognize this person?

13 A I believe so. I believe she did -- she did security  
14 for Mr. Kelly.

15 Q Do you know her name?

16 A Cookie. I'm not for sure, but I would say Cookie.

17 Q Okay. Now, did there come a time when the defendant  
18 asked you to come to his resident at Olympia Fields, and it  
19 wasn't for a party?

20 A Correct.

21 Q And how did that come about?

22 A He just wanted to see me and told me to come on by.

23 Q And what, if anything -- and did you go?

24 A Yes.

25 Q And what, if anything, happened once you got to the

Alex - Direct - Shihata

3343

1 Olympia Fields residence?

2 A He opened the gates for me and told me to wait inside  
3 his Maybach at that time.

4 Q And did you wait inside the Maybach?

5 A Yes.

6 Q And did the defendant stay or leave after letting you  
7 inside?

8 A He -- he told me to wait on him for like 20 minute.

9 Q And actually just to be clear, when he opened the gates  
10 for you, did you actually see him at that time?

11 A No. He was already gone from the house.

12 Q Okay. So how did he tell you to a wait in the Maybach;  
13 was that by phone.

14 A Yes. I believe through texts, he told me to get inside  
15 the Maybach and wait for him.

16 Q And about how long did you wait inside the Maybach?

17 A Roughly around 20 minutes.

18 Q And what, if anything, happened after 20 minutes,  
19 roughly?

20 A Then Mr. Kelly came out and we got inside the Maybach,  
21 as well.

22 Q And after the defendant got inside the Maybach with  
23 you, what do you recall happening?

24 A I recall him just talking to me, then forcefully  
25 kissing me and licking my face.



Alex - Direct - Shihata

3344

1 Q And how, if at all, did you react at that time?

2 A Numb, shocked, that's about all I could do.

3 Q What, if anything, do you recall the defendant saying  
4 to you at that time?

5 A Just to be open-minded --

6 Q And what --

7 A -- just to be open-minded.

8 Q Do you recall anything else about that encounter?

9 A No. That was just a brief contact that night, and then  
10 like I went home.

11 Q Now, did the defendant stop making sexual advances to  
12 you after that?

13 A No.

14 Q And what other sexual advances do you remember him  
15 making to you?

16 A One time he told me to take off my pants, sit down in  
17 the chair, and he began to give me oral sex.

18 Q And who initiated that encounter?

19 A Mr. Kelly, the defendant.

20 Q Do you remember where that took place?

21 A At his residence in Olympia Fields.

22 Q And do you remember anything about where in the  
23 residence that was?

24 A That particular time, no. It was in one of the rooms  
25 upstairs.

Alex - Direct - Shihata

3345

1 Q And do you recall whether that encounter was recorded?

2 A Yes.

3 Q Do you remember how it was recorded?

4 A iPad.

5 Q And whose iPad was it?

6 A Mr. Kelly's.

7 Q And who set up the recording?

8 A The defendant.

9 Q Now, did there also come a time when the defendant --  
10 well, actually, withdrawn.

11 At some point did you have a sexual encounter with  
12 the defendant and another person?

13 A Yes.

14 Q And how did that come about, the first time that  
15 happened?

16 A He said he had a gift for me and to come by his house.

17 Q Who said that to you?

18 A The defendant.

19 Q And where did you go after you arrived at  
20 Olympia Fields?

21 A He told me to wait in one of the rooms upstairs. I  
22 believe it was one of his kids' rooms.

23 Q And what happened after you waited in the room?

24 A He came in and told me to, you know, don't be nervous,  
25 and, you know, take off my clothes, and he sent a half-naked

Alex - Direct - Shihata

3346

1 lady into the room.

2 Q And did you know the lady he sent into the room before?

3 A No.

4 Q Did the defendant tell you her name?

5 A No.

6 Q Prior to that day, had you asked the defendant to  
7 provide you with a girl or a woman?

8 A No.

9 Q What happened after this person entered the room?

10 A He pretty much just told us to go at. But we didn't  
11 know what to do because he was still in the room, so we  
12 didn't know what to do.

13 Q And after that, what happened?

14 A So he instructed us to start kissing and mean it.

15 Q He told you to "mean it"?

16 A Yeah, he told us to mean it. Start kissing each other.

17 Q And what, if anything, did you notice was in the room  
18 while this was happening?

19 A iPad, recording camera, lights, production lights.

20 Q And after the defendant told you and the female present  
21 to start kissing and to mean it, what happened?

22 A He started recording it and started masturbating.

23 Q And what, if anything, else did the defendant tell you  
24 to do?

25 A Pretty much to have sex with her, before she gave us --

Alex - Direct - Shihata

3347

1 should I say, "blow jobs"? Can I say blow jobs?

2 She gave us blow jobs.

3 Q Okay. So who, if anyone, told the female to give you a  
4 blow job?

5 A The defendant.

6 Q Okay. And by "blow job," do you mean oral sex?

7 A Yes.

8 Q And who, if anyone, told the female to give the  
9 defendant oral sex?

10 A Nobody.

11 What's you mean? Rephrase that question.

12 Q Did anyone tell the female to give Rob oral sex?

13 A The defendant.

14 Q Now, after the oral sex, what, if anything, did the  
15 defendant tell you to do?

16 A After the oral sex and everything, he told me to wait  
17 in the room.

18 Q Okay. When you say "and everything" what are you  
19 referring to?

20 A Because I had to penetrate the young lady at that time.

21 Q And by "penetrate," do you mean you had sexual  
22 intercourse with her?

23 A Yes.

24 Q And did you penetrate her vaginally?

25 A Yes.

Alex - Direct - Shihata

3348

1 Q During this encounter, who, if any, was in charge?

2 A The defendant.

3 Q Why did you do what the defendant told you to do?

4 A Actually, I have no idea.

5 Q And after the encounter you just described with this  
6 other female at Olympia Fields, did you have other sexual  
7 encounters with the defendant?

8 A Correct.

9 Q Including with other females?

10 A Correct.

11 Q And did the sexual encounters, sometimes were they just  
12 you and the defendant?

13 A Yes.

14 Q When you had sexual encounters with you and just the  
15 defendant, who was in control?

16 A The defendant.

17 Q What did the defendant tell you to do to him?

18 A Give him oral -- oral sex.

19 Q Did he ask you to do anything else, as well?

20 A Drive up his butt.

21 Q How, if at all, were these encounters recorded?

22 A iPad.

23 Q Where did these sexual encounters with just the  
24 defendant take place?

25 A At his residence, at his studio, tour bus.

Alex - Direct - Shihata

3349

1 Q And when you say "his residence," which residence --  
2 which residence or residences are you referring to?

3 A The Olympia Fields residence, the Trump Towers  
4 apartment.

5 Q And when you say "studios," which studios are you  
6 referring to?

7 A The studio off Ohio and the studio off Justine.

8 Q Showing you what's in evidence as  
9 Government's Exhibit 503A. Do you recognize this?

10 A Sure. Yes, I do.

11 Q What is this a photograph of?

12 A The studio on Justine.

13 Q Now, during your sexual encounters with the defendant,  
14 what, if anything, did the defendant tell you to call him?

15 A Daddy.

16 Q You also mentioned a sexual encounter with the  
17 defendant on a tour bus; is that correct?

18 A Correct.

19 Q And where on the tour bus did that take place?

20 A Back room.

21 Q The back room of the tour bus?

22 A Yes.

23 Q And was the tour bus parked or moving when that  
24 happened?

25 A Parked.

Alex - Direct - Shihata

3350

1 Q And do you recall where it was parked?

2 A Downtown Chicago.

3 (Continued on the next page.)

4

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Alex - direct - Shihata

3351

1 EXAMINATION CONTINUES

2 BY MS. SHIHATA:

3 Q Now, apart from, I think you testified that apart from  
4 the first encounter with the defendant and a female at Olympia  
5 Fields that you've already described, that there were other  
6 times, other encounters with the defendant and other females,  
7 is that right?

8 A Correct.

9 Q About how many times do you recall having an encounter  
10 with the defendant and another female?

11 A Countless.

12 Q Countless?

13 A Correct.

14 Q And who was in charge during those encounters?

15 A The defendant.

16 Q What types of sexual acts did he direct you to engage in  
17 with these females?

18 A Penetration, they put they mouth on me, you know, hugging  
19 and kissing.

20 Q And when you say put their mouth on me, what part of your  
21 body are you referring to?

22 A My genitals.

23 Q And while these acts were going on, what was the  
24 defendant doing?

25 A Either masturbating or watching.

SAM

OCR

RMR

CRR

RPR



Alex - direct - Shihata

3352

1 Q Did the defendant tell you or the female what you should  
2 be doing?

3 A Correct.

4 Q And did he record these interactions?

5 A Yes.

6 Q And how did he record them?

7 A By iPad.

8 Q Did the defendant ever engage with you and the females  
9 during these interactions, did he ever engage with you or the  
10 females sexually during the interactions?

11 A Correct, yes.

12 Q What, if anything, did the defendant call you during  
13 these encounters with other females?

14 A Nephew.

15 Q Are you the defendant's nephew?

16 A No.

17 Q Are you in any way related to the defendant?

18 A No.

19 Q At the times you engaged in these sexual acts with other  
20 females that the -- withdrawn.

21 At the time you engaged in these sexual acts, did  
22 you know the names of any of these females?

23 A No.

24 Q In what locations do you recall engaging in sexual acts  
25 with these females?

SAM

OCR

RMR

CRR

RPR

Alex - direct - Shihata

3353

1 A His residence, his studio, trips out the state.

2 Q And do you recall -- do you recall whether any of these  
3 encounters ever occurred in hotel rooms?

4 A Yes.

5 Q What, if any, rules were there during these encounters?

6 A Not that -- we wasn't allowed to talk to each other.

7 Q And when you say "we" weren't allowed to talk to each  
8 another, who is the "we" you're referring to?

9 A His lady, the female.

10 Q And yourself?

11 A Yes.

12 Q Now, did you engage in sexual acts with certain of these  
13 females more than once?

14 A Correct.

15 Q And were all of these encounters in the defendant's  
16 presence?

17 A Correct.

18 Q Do you recall what some of the females the defendant told  
19 you to engage in sexual acts with, what they looked like?

20 A Yes.

21 Q And fair to say you don't recall all of them?

22 A Fair to say.

23 Q I'm showing you what's in evidence as Government  
24 Exhibit 69(b).

25 Do recognize this person?

Alex - direct - Shihata

3354

1 (Exhibit published.)

2 A Correct.

3 Q And is this one of the females that the defendant  
4 directed you to engage in sexual acts with?

5 A Yes, one of the first ones, yes.

6 Q Did you engage in sexual acts with her once or multiple  
7 times?

8 A Multiple.

9 Q At the time of those acts, did you know her name?

10 A No.

11 Q What type of acts do you recall engaging in with the  
12 individual in Government Exhibit 69(b)?

13 A Sexual.

14 Q And what do you mean by that?

15 A Sexual acts and things sexual.

16 Q What type of sexual acts?

17 A Penetration or kissing or orally, she giving me orally.

18 Q And did the defendant ever engage in sexual acts with  
19 both you and this individual?

20 A Yes.

21 Q And, again, were these interactions recorded?

22 A Yes.

23 Q And do you recall how they were recorded?

24 A iPad.

25 Q And who, if anyone, told you what to do during your

Alex - direct - Shihata

3355

1 encounters with the individual in 69(b)?

2 A The defendant.

3 Q And who, if anyone, told the individual in 69(b) what to  
4 do during these encounters?

5 A The defendant.

6 Q I am showing you what's in evidence as Government  
7 Exhibit 75.

8 Do you recognize this person?

9 (Exhibit published.)

10 A Correct.

11 Q Is this one of the females that the defendant directed  
12 you to engage in sexual acts with?

13 A Correct.

14 Q Was that once or more than once?

15 A More than once.

16 Q And at the time of these sexual encounters, did you know  
17 this person's name?

18 A No.

19 Q And what types of acts did he -- did the defendant direct  
20 you to engage in --

21 A Sexual.

22 Q -- with this person?

23 A Sexual acts.

24 Q Including penetration?

25 A Yes.

Alex - direct - Shihata

3356

1 Q And by that I mean sexual intercourse?

2 A Yes.

3 Q And during those encounters with this individual in  
4 Government Exhibit 75, who directed you, who, if anyone,  
5 directed what you should be doing during those encounters?

6 A The defendant.

7 Q And who, if anyone, directed what the individual in  
8 Government Exhibit 75 should be doing during those encounters?

9 A The defendant.

10 Q Were these encounters with this individual recorded?

11 A Yes.

12 Q How were they recorded?

13 THE COURT: Can I just ask, is it fair to say that  
14 for all of these people that you're describing, you were  
15 instructed to do the same types of sexual acts?

16 THE WITNESS: Correct.

17 THE COURT: All right, go ahead.

18 MS. SHIHATA: Thank you.

19 BY MS. SHIHATA:

20 Q How --

21 THE COURT: Let me ask one other question, sorry.

22 And is it also fair to say for all of them they were  
23 recorded?

24 THE WITNESS: A hundred percent.

25 THE COURT: On an iPad?

Alex - direct - Shihata

3357

1 THE WITNESS: Yes.

2 THE COURT: Sorry, go ahead.

3 BY MS. SHIHATA:

4 Q I'm showing you Government Exhibit 78.

5 Do you recognize this person?

6 (Exhibit published.)

7 A Yes.

8 Q And is this one of the females that the defendant  
9 directed you to engage in sexual acts with?

10 A Correct.

11 Q Once or more than once?

12 A More than once.

13 Q I'm showing you what's in evidence as Government  
14 Exhibit 76.

15 Do you recognize this person?

16 (Exhibit published.)

17 A She looks familiar, but I'm not a hundred percent sure --

18 Q Okay.

19 A -- I recognize.

20 Q Where do you think she looks familiar from?

21 A One time in Miami.

22 Q And what happened in Miami?

23 A In the room, sexual, sexual intercourse with a young lady  
24 and the defendant.

25 Q Fair to say she looks familiar, but you're not sure if

Alex - direct - Shihata

3358

1 that's the person --

2 A Fair to say.

3 Q -- that you engaged in a sexual act with?

4 A Very fair to say.

5 Q But was there a female in Miami that you engaged in a  
6 sexual -- in sexual acts with at the defendant's direction?

7 A Correct.

8 Q And, again, was this recorded?

9 A Correct.

10 Q And at the time of -- at the time of these acts, fair to  
11 say, like all the others, you didn't know the female's name?

12 A No; fair to say.

13 Q Now, during these encounters with these females and the  
14 defendant, how did the females appear to you during these  
15 encounters?

16 MR. CANNICK: Objection.

17 THE COURT: Well, I'll sustain it as to form.

18 Are you asking about demeanor and things like that?

19 MS. SHIHATA: Yes.

20 THE COURT: All right.

21 Describe what you noticed about all or some of the  
22 women that you've discussed so far.

23 THE WITNESS: I don't know, zombie-ish.

24 BY MS. SHIHATA:

25 Q Apart from telling you what sexual acts to engage in with

Alex - direct - Shihata

3359

1 these women, what, if any -- what other types of things would  
2 the defendant tell you and the -- and the females during these  
3 encounters?

4 A Can you rephrase that?

5 Q Sure.

6 I think you testified he would direct what acts --

7 A Correct.

8 Q -- sexual acts should happen, is that fair to say?

9 A Correct.

10 Q And other than that, would he also tell you other than,  
11 you know, have sex or give oral or whatever, did he also  
12 direct you in other ways or say other things during these  
13 encounters?

14 A Yeah, like, we kissing, do it like we mean it, you know,  
15 things like that.

16 Q And when he said "do it like you mean it," was that only  
17 in reference to kissing or other things as well?

18 A Just every -- just other things. Like, he might tell us  
19 to moan, you know. Moan like you mean it or something like  
20 that.

21 Q Now, I think just going back for a moment to the first  
22 sexual encounter you had, the first time there was a female  
23 brought into the room by the defendant in Olympia Fields.

24 I think you mentioned on that occasion you remember  
25 some lights, is that right?



Alex - direct - Shihata

3360

1 A Yes.

2 Q And an iPad, is that correct?

3 A Yes.

4 Q And do you remember any other recording equipment on that  
5 occasion?

6 A Just that -- just the recorder I mentioned.

7 Q Which recorder was that, what type of recorder?

8 A Like a regular video recorder on a tripod.

9 Q Now, after your sexual encounters with the defendant or  
10 with these other women and the defendant, were there times the  
11 defendant gave you something?

12 A Yeah, he had gave me a few dollars, you know.

13 Q And what do you mean by a few dollars?

14 A He'd slap a hundred or two in my hand, you know, just for  
15 my time and my gas and everything.

16 Q Were there ever times you traveled to see the defendant?

17 A Yes.

18 Q And where do you recall traveling to see the defendant?

19 A I believe twice in Atlanta and once in Miami.

20 Q And approximately when do you recall those two times that  
21 you traveled to Atlanta, approximately when was that?

22 A Around 2014.

23 Q And how about when you traveled to Miami, approximately  
24 when was that ?

25 A Approximately 2017.

SAM

OCR

RMR

CRR

RPR

Alex - direct - Shihata

3361

1 Q And who paid for your travel to Atlanta and Miami?

2 A The defendant.

3 Q And did you stay at a hotel?

4 A Correct.

5 Q And did he pay for the hotel?

6 A Correct.

7 Q And who made those arrangements for you?

8 A Some lady, I believe her name was Diana, his assistant.

9 Q And who put you in touch with Diana?

10 A The defendant.

11 Q How, if at all, did you communicate with Diana?

12 A Strictly text.

13 Q Did you ever meet Diana in person?

14 A No.

15 Q When you traveled to see the defendant, what was the  
16 purpose of the travel?

17 A Sexual.

18 Q And did you engage in sexual encounters during those  
19 trips?

20 A Correct.

21 Q With the defendant?

22 A Yes, correct.

23 Q How about with any others?

24 A Yes, correct.

25 Q Other females?

SAM

OCR

RMR

CRR

RPR

Alex - direct - Shihata

3362

1 A Yes.

2 Q During the time you knew the defendant, did he ever  
3 invite you to any of his concerts?

4 A No.

5 Q Did he ever take you out publicly anywhere?

6 A No.

7 Q Now, you mentioned you went to parties at Olympia Fields.  
8 Did you also sometimes go to parties at the  
9 defendant's studios?

10 A Correct.

11 Q And do you recall what types of parties you went to at  
12 the studio?

13 A Just regular Saturday night parties he would throw,  
14 Friday night; regular Friday, Saturday night parties that he  
15 would throw over the weekend.

16 Q Now, you mentioned earlier that you traveled to Atlanta  
17 twice and Miami or that you recall traveling to those  
18 locations to see the defendant, correct?

19 A Correct.

20 Q At any of those locations do you recall the defendant  
21 telling you anything about what you should tell people, who  
22 you should tell people you were?

23 A Yeah, I was his stylist.

24 Q And what do you recall him telling you about that?

25 A Just -- just if anybody ever asked, he said you my

Alex - direct - Shihata

3363

1 stylist.

2 Q Over the time you knew the defendant, were there times  
3 when you distanced yourself from him?

4 A Yes.

5 Q And why did you distance yourself from him?

6 A Just feeling used, abused, lied to. So many emotions, so  
7 many reasons for different times.

8 Q Did this happen more than once?

9 A Correct.

10 Q Do you recall around what time periods this happened?

11 A Yes, 2015, 2016, half of 2017.

12 Q Now, did those periods of distance last?

13 A No.

14 Q Why not?

15 A My best friend at the time, he would reach out to him and  
16 try to get in contact with me each and every time.

17 Q And when you say your best friend, are you --

18 A Louis.

19 Q -- referring to Louis?

20 And when you say he would reach out to him, who is  
21 the "he" in that sentence and who is the "him" in that  
22 sentence?

23 A The defendant would reach out to Louis.

24 Q And reach out to him for what?

25 A To -- to tell me to call him or just to get in contact

Alex - direct - Shihata

3364

1 with me.

2 Q To tell you to call the defendant?

3 A Yes.

4 Q Have you ever stolen anything from the defendant?

5 A Yes.

6 Q What did you steal?

7 A Cash.

8 Q Approximately how much money did you steal from the  
9 defendant?

10 A Around 8,000.

11 Q And do you recall around when that happened?

12 A 2013.

13 Q And where did you steal that money from?

14 A Out of his backpack.

15 Q And how did that come about, why were you -- why were you  
16 at his backpack?

17 A I think I was in his backpack to retrieve a iPad or  
18 something.

19 Q And what did you -- what, if anything -- well, is that  
20 where you noticed cash inside of the backpack?

21 A Yes.

22 Q And do you recall anything about what the backpack looked  
23 like?

24 A It was a designer backpack, could have been a Gucci  
25 backpack.

SAM

OCR

RMR

CRR

RPR

Alex - direct - Shihata

3365

1 Q After you met, going back to when you met the defendant  
2 back in high school, did the defendant ever tell you he would  
3 look out for you?

4 A All the time.

5 Q And what did he say to you?

6 A How he got me and how he will give me a job, you know, or  
7 make me his height man. Just things like that.

8 Q And when the defendant began telling you this, was that  
9 before or after your first sexual encounter with him?

10 A Both.

11 Q And did that ever happen?

12 A No.

13 Q I'd like to direct your attention to the year 2011.

14 Were you arrested that year?

15 A Yes.

16 Q And what were you arrested for?

17 A At the time it was robbery, but it was theft.

18 Q Did you end up pleading guilty to theft?

19 A Yeah.

20 Q And following your arrest, were you immediately released  
21 on bond or did you spend some time in jail?

22 A No, I spent some time in jail.

23 Q And were you eventually released on bond?

24 A Yes.

25 Q After about how long?

SAM

OCR

RMR

CRR

RPR

Alex - direct - Shihata

3366

1 A About four months.

2 Q And who, if anyone, posted your bond to get you released?

3 A My mom.

4 Q What, if anything, did you learn about the defendant  
5 providing money for your bond?

6 A I learned that he gave my best friend at the time money  
7 towards my bond that my mom had never -- my mom never  
8 received.

9 Q And when you say your best friend, are you referring to  
10 Louis?

11 A Yes.

12 Q And who did you learn that from?

13 A From the defendant and from Mr. -- Louis.

14 Q After that, what, if anything, happened regarding your  
15 friendship with Louis?

16 A Soured.

17 Q Did you stop speaking to Louis for a period of time?

18 A Correct.

19 Q And did you eventually start speaking with Louis again?

20 A Correct.

21 Q Are you familiar with the docuseries "Surviving  
22 R. Kelly"?

23 A Yes, I am.

24 Q Did you see the defendant after "Surviving R. Kelly"  
25 aired on television?

Alex - direct - Shihata

3367

1 A Yes.

2 Q And where did you see him?

3 A Where did I see him? I seen him several occasions.

4 Q Okay. Did there come a point where you saw the defendant  
5 at his residence in Trump Tower?

6 A Yes.

7 Q In 2019?

8 A Yes.

9 Q And how did it come about that you were at the  
10 defendant's apartment in Trump Tower on that occasion?

11 A He said he needed me to do something for him, and stop on  
12 by.

13 Q When you say "he," are you referring to the defendant?

14 A To the defendant, yes.

15 Q And after you arrived at the defendant's apartment at  
16 Trump Tower, what happened?

17 A I gets there and he say he need me to write something for  
18 him.

19 Q And what did the defendant tell you he needed you to  
20 write for him?

21 A Pretty much just saying we had no sexual relationship  
22 with each other.

23 Q Did you write the letter the defendant asked you to  
24 write?

25 A Yes.



Alex - direct - Shihata

3368

1 Q And did the defendant ask you to sign the letter?

2 A Correct.

3 Q Who decided, who, if anyone, decided what would be  
4 written in that letter?

5 A He told me word for word.

6 Q When you say --

7 A Word for word, the defendant.

8 Q The defendant.

9 And after you wrote and signed the letter, who, if  
10 anyone, did you give it to?

11 A The defendant.

12 Q Was what you wrote in the letter false?

13 A Correct.

14 Q Why did you write the letter?

15 A Just for him.

16 Q Did you receive a subpoena to be here today?

17 A Correct.

18 Q Do you want to be here today testifying about these  
19 matters?

20 A No.

21 Q Have you ever spoken publicly about these matters before  
22 today?

23 A No.

24 MS. SHIHATA: No further questions.

25 THE COURT: Cross-examination?

Alex - cross - Cannick

3369

1 MR. CANNICK: Yes, ma'am.

2 CROSS-EXAMINATION

3 BY MR. CANNICK:

4 Q You testified and told us about being arrested for  
5 robbery?

6 A Yes.

7 Q And when was that?

8 A Around 2012.

9 Q That was 2012.

10 You were arrested along with Louis for that robbery,  
11 am I correct?

12 A Correct.

13 Q Yes. You and Louis robbed somebody, am I correct?

14 A Not somebody, but a business, yes.

15 Q A business?

16 A Yes.

17 Q Okay. What did you take from the business?

18 A Cash.

19 Q Cash?

20 A Yes.

21 Q How much cash?

22 A I don't know.

23 Q How old were you?

24 A I was twenty -- probably 22.

25 Q Okay. Rob didn't direct you to do that, am I correct?

SAM

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Alex - cross - Cannick

3370

1 A No.

2 Q Rob didn't instruct you to do that, am I correct?

3 A Not at all.

4 Q In fact, you and Louis did that on your own, am I  
5 correct?

6 A Yeah, I did it as a favor for Louis, yes.

7 Q You did it as a favor?

8 A Yes.

9 Q So, Louis asked you for a favor and you did it?

10 A Took some real pulling, but yes.

11 Q Took some real pulling.

12 But he pulled you -- it took some pulling, but you  
13 did it.

14 How did you get in the place?

15 A A key.

16 Q A key. How did you get the key?

17 A From Louis.

18 Q Louis. How did Louis get the key?

19 A He worked there.

20 Q How was you caught? How were you caught?

21 A Louis came back for his last check.

22 Q So, Louis set up the place that he worked for?

23 A Yeah.

24 Q And you -- after that you stole, at some point you stole  
25 from Mr. Kelly?

SAM

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RMR

CRR

RPR

Alex - cross - Cannick

3371

1 A Yeah, correct.

2 Q And Louis stole from Mr. Kelly as well, am I correct?

3 MS. SHIHATA: Objection.

4 THE COURT: Did you see anything like that?

5 THE WITNESS: So, I'll say yes.

6 BY MR. CANNICK:

7 Q Well, yes, you'll say yes because he stole from him, am I  
8 correct?

9 A Yeah, yeah, he stole a camera before I left, that's how I  
10 know that.

11 Q And according to you, he also stole the bail money that  
12 Mr. Kelly put up?

13 A Yes, correct.

14 Q Would you call him a thief?

15 MS. SHIHATA: Objection.

16 THE COURT: Sustained.

17 BY MR. CANNICK:

18 Q Would you call yourself a thief?

19 MS. SHIHATA: Objection.

20 THE COURT: Sustained.

21 Q Now, you testified and told us that you got Mr. Kelly's  
22 number when you were in your junior high school year?

23 MS. SHIHATA: Objection. Junior high school or  
24 junior in high school?

25 BY MR. CANNICK:

SAM

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RPR

Alex - cross - Cannick

3372

1 Q Junior year in high school?

2 A Okay.

3 Q Okay what?

4 A Correct.

5 Q Well, how old were you in your junior year in high  
6 school?

7 A When I met Mr. Kelly, I was 16.

8 Q No, I'm not asking you when you met Mr. Kelly, I'm asking  
9 you how old were you when you were in your junior year in high  
10 school?

11 A I was 16 going on 17.

12 Q And how old were you when you got Mr. Kelly's number?

13 A Seventeen.

14 Q Okay. Are you sure about that?

15 A Yeah, I'm pretty positive.

16 Q You're pretty positive?

17 A Yeah.

18 Q Would it surprise you that you told the Government that  
19 you met -- when you got his number -- that you didn't get his  
20 number until around 2009?

21 A No, false.

22 Q What?

23 A False.

24 Q That's false, right?

25 A Yes.

Alex - cross - Cannick

3373

1 Q Didn't happen, right?

2 A What you mean?

3 Q That if it's in here and the Government wrote down that  
4 you told them that you got Mr. Kelly's number around 2009,  
5 that would be false, am I correct?

6 A No, I didn't get his number around 2009.

7 Q Right, because you would have been 19 at that time, am I  
8 correct?

9 A Yes, correct.

10 Q I want you to look at this document and see if it  
11 refreshes your recollection that you told the Government that  
12 this was around 2009?

13 PROSPECTIVE JUROR: It's not gonna reflect [sic]. I  
14 don't remember it saying 2009.

15 Q Without even looking at it --

16 THE COURT: Just take a look at it and see if it  
17 refreshes your recollection.

18 And just questions, Mr. Cannick, not statements.

19 MR. CANNICK: Right.

20 (Pause.)

21 BY MR. CANNICK:

22 Q Down to the bottom in the highlighted yellow portion.  
23 You read it?

24 A (No response.)

25 Q Did you read it?

Alex - cross - Cannick

3374

1 A Correct.

2 Q Does it refresh your recollection that you told the  
3 Government it was in 2009 that you got Mr. Kelly's number?

4 THE COURT: Do you understand the question?

5 THE WITNESS: Yeah, I understand the question.

6 THE COURT: Okay. So, he wants to know if it  
7 refreshes your recollection?

8 THE WITNESS: No, but I didn't get his number in  
9 2009. So, I don't know what happened with that statement.

10 BY MR. CANNICK:

11 Q But you read it in that document, am I correct?

12 A Correct.

13 Q The document said you told them that you got it -- got  
14 Mr. Kelly's number in 2009, am I correct?

15 MS. SHIHATA: Objection.

16 THE COURT: Sustained as to form. It doesn't  
17 refresh his recollection.

18 BY MR. CANNICK:

19 Q It's written in the document that you got Mr. Kelly's  
20 number --

21 MS. SHIHATA: Objection.

22 THE COURT: Sustained.

23 BY MR. CANNICK:

24 Q You interviewed with the Government, am I correct?

25 A Correct.

Alex - cross - Cannick

3375

1 Q And you were the one who gave the information about when  
2 it was that you supposedly got Mr. Kelly's number, am I  
3 correct?

4 A Correct.

5 Q Now, these things that you said that happened between you  
6 and Mr. Kelly sexually, how old were you?

7 A I was around twenty.

8 Q You were twenty years old or older?

9 A Hum?

10 Q Is that a yes or a no, sir?

11 A I said I was twenty years old.

12 Q You were at least twenty years old?

13 A Yeah, I was at least twenty years old; yes.

14 Q And then you testified and told us about Mr. Kelly,  
15 according to you, directed you to be involved in a sexual  
16 encounter with a female?

17 A Correct.

18 Q And how old were you the first time that happened?

19 A Twenty.

20 Q Twenty as well?

21 A Yes.

22 Q Now, and you testified and told us that there came a  
23 point in time that you had a sexual encounter, according to  
24 you, at Mr. Kelly's direction with --

25 MR. CANNICK: May I see the photograph 75?



Alex - cross - Cannick

3376

1 BY MR. CANNICK:

2 Q Is it on your monitor?

3 A Yes.

4 Q You testified and told us that Mr. Kelly directed you,  
5 according to you, to have sex with this person?

6 (Exhibit published.)

7 A Correct.

8 Q When you had sex with this person, did you -- did you use  
9 a condom?

10 A Sometimes, sometimes not, no.

11 Q But sometimes you didn't, am I correct?

12 A Yes.

13 Q And you testified that Mr. Kelly also asked you or  
14 instructed you, according to you, to have sex with a number of  
15 females?

16 A Correct.

17 Q And do you recall having sex with these females with a  
18 condom?

19 A Sometimes there wasn't a condom.

20 Q But most of the times it was no condom according to you?

21 A Yeah -- I mean not most of the time. Most of the time it  
22 probably was with a condom.

23 Q Oh, most of the time it was with a condom?

24 A It was probably less time without a condom.

25 Q Oh, okay.

SAM

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RPR

Alex - cross - Cannick

3377

1 MR. CANNICK: Your Honor, if the Court would just  
2 bear with me for a few minutes.

3 THE COURT: Sure.

4 (Pause.)

5 BY MR. CANNICK:

6 Q Did you ever work for Mr. Kelly?

7 A No.

8 Q Never ironed his clothes or anything like that?

9 A No.

10 Q And you testified that there were times that you tried --  
11 that you distanced yourself from Mr. Kelly?

12 A Correct.

13 Q And then you then went back because of a phone call or  
14 something like that?

15 A Yes.

16 Q Okay. And you did that of your own choosing, am I  
17 correct?

18 A Correct.

19 MR. CANNICK: Your Honor, I am trying to find a  
20 document.

21 THE COURT: That's all right.

22 (Pause.)

23 Q And you weren't paid to be his personal shopper?

24 A No, one time I shopped for him from his request.

25 Q Okay. Now, during your interview with the Government,

Alex - cross - Cannick

3378

1 didn't you tell the Government that Kelly hired you to pick  
2 out his clothes day-to-day and assist in his wardrobe for his  
3 concert, didn't you tell that to the Government?

4 A Those are the things he wanted me to --

5 Q Beg your pardon?

6 A Those are the things he wanted me to say that I did.

7 Q But that's what you told the Government, am I correct?

8 A Yeah, I told --

9 Q Mr. Kelly wasn't there with you at the Government's  
10 office?

11 THE COURT: You have to let him finish answering --

12 MR. CANNICK: Okay.

13 THE COURT: -- and then you can --

14 BY MR. CANNICK:

15 Q Mr. Kelly wasn't with you at the Government's office when  
16 you were giving this interview, am I correct?

17 A Correct.

18 Q You were there alone with U.S. Marshals, am I correct?

19 MS. SHIHATA: Objection.

20 A No.

21 THE COURT: Overruled.

22 Do you know who was there?

23 THE WITNESS: Yes. Some agents, but not marshals.

24 I don't think they marshals.

25 BY MR. CANNICK:

Alex - cross - Cannick

3379

1 Q Okay, so you were there with some federal agents?

2 A Yes.

3 Q You were there with some federal lawyers?

4 A Okay.

5 Q Okay what?

6 A Yes, true.

7 Q But you weren't there with Mr. Kelly?

8 A Correct.

9 Q You were giving them information?

10 A Yes.

11 Q "Them" being these government officials that you just  
12 spoke of?

13 A Correct.

14 Q And when you gave them this information, isn't it a fact  
15 that you told them that during 2012 to 2004 [sic] that Kelly  
16 paid you to be his personal shopper, Kelly hired you to pick  
17 out his clothing for day-to-day wear and wardrobe his concert,  
18 didn't you tell them that?

19 A No, he told me to -- to lie and say I did those things,  
20 but I did pick out his clothes once.

21 Q So, you lied to the federal agent?

22 A No, those are things he told me that I did.

23 Q Well, if he told you and it wasn't true, then it's a lie?

24 A I'm telling them what he told me.

25 Q No, my question is he wasn't in the room when you were

SAM

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Alex - cross - Cannick

3380

1 telling the federal government this, am I correct?

2 A No; correct.

3 Q You were sitting there in front of them, am I correct?

4 A Correct.

5 Q You were giving them information, am I correct?

6 A Correct.

7 Q Mr. Kelly was no place to be found, am I correct?

8 A Correct.

9 Q So, when they asked you about what you were doing for  
10 him, you told them that he hired you to be his personal  
11 shopper?

12 A Yeah, when you brainwashed along, yeah.

13 Q Oh, you were brainwashed now?

14 A When you brainwashed along, that's how.

15 Q Okay. You were brainwashed for how long, sir?

16 A Objection.

17 THE COURT: You can't object. Do you understand the  
18 question?

19 THE WITNESS: No, I don't. I don't know how -- I  
20 don't know what time.

21 MR. CANNICK: You want an objection, don't you?

22 THE COURT: Do you want to put another question?

23 MR. CANNICK: No, Your Honor, I'm done.

24 THE COURT: I overruled his objection.

25 No more questions?

Alex - redirect - Shihata

3381

1 MR. CANNICK: I'm done.

2 THE COURT: Any redirect?

3 MS. SHIHATA: Yes.

4 THE COURT: Okay.

5 REDIRECT EXAMINATION

6 BY MS. SHIHATA:

7 Q The first time you met with federal agents, they came to  
8 your house, correct?

9 A Correct.

10 Q And you had no idea how they found you, correct?

11 A No idea.

12 Q Were you expecting them --

13 A No.

14 Q -- when they came?

15 A No.

16 Q And you told them -- I think you testified on  
17 cross-examination -- did you tell them that you told them  
18 things the defendant had told you to say previously, is that  
19 right?

20 A Correct.

21 Q That you were his stylist?

22 A Correct.

23 Q And previously the defendant had told you to say these  
24 things if anybody asked, right?

25 A Correct.

Alex - recross - Cannick

3382

1 MS. SHIHATA: Nothing further.

2 THE COURT: Anything else?

3 MR. CANNICK: Just one thing.

4 THE COURT: Only one?

5 MR. CANNICK: Give me four.

6 RECROSS-EXAMINATION

7 BY MR. CANNICK:

8 Q When they came, when the agents came to you, they  
9 introduced themselves as federal marshals -- federal agents?

10 THE COURT: As what?

11 MR. CANNICK: Federal agents.

12 A No, no, I was at home at the time.

13 Q No, at some point in time you met them?

14 A Yeah, yeah.

15 Q And they introduced themselves to you as federal agents,  
16 am I correct?

17 A Like Homeland Security or something.

18 Q Yes, Homeland Security?

19 A Right.

20 Q You understood that they were federal agents, am I  
21 correct?

22 A Correct.

23 Q And they also told you that making a false statement to  
24 them was a crime, am I correct?

25 A Correct -- no.

SAM

OCR

RMR

CRR

RPR

Alex - recross - Cannick

3383

1 Q Oh, they didn't tell you that?

2 A They didn't tell me nothing like that, no.

3 Q Oh, okay.

4 MR. CANNICK: No more questions, Your Honor.

5 THE COURT: All right, anything else?

6 MS. SHIHATA: Nothing further.

7 THE COURT: All right, thank you so much. You can  
8 step down.

9 THE WITNESS: Thank you.

10 (Witness steps down and exits the courtroom.)

11 THE COURT: How is everybody doing? Good? Do you  
12 want a break?

13 All right, so a few people want a break. We will  
14 break for -- you do want to go or you don't?

15 THE JURORS: Yes.

16 THE COURT: All right.

17 THE COURTROOM DEPUTY: All rise.

18 (Jury exits.)

19 THE COURT: Everybody have a seat.

20 Do you have another witness?

21 MS. GEDDES: Yes.

22 THE COURT: And who is the witness?

23 MS. GEDDES: Alesiette Mayweather.

24 THE COURT: Oh, could I see the parties at the side  
25 for just a second?

SAM

OCR

RMR

CRR

RPR



Alex - recross - Cannick

3384

1 (Sidebar held off the record with the Court and  
2 counsel only.)

3 THE COURT: We're in recess.

4 (Recess taken.)

5 (Judge ANN M. DONNELLY exited the courtroom.)

6

7 (Continued on the following page.)

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SAM

OCR

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RPR

Proceedings

3385

1 (continuing.)

2 THE COURT: Tell me the name of the witness.

3 So, there are some exhibits that this next witness  
4 is going to testify about. They're in the form of text  
5 messages that she sent to various people, I guess.

6 MS. GEDDES: That's correct. There are text  
7 messages that she sent to her sister and a coworker and a  
8 friend about her employment with the defendant while she was  
9 working for him.

10 THE COURT: And you have no objection; is that right  
11 Mr. Cannick.

12 MR. CANNICK: None.

13 THE COURT: What is the number?

14 MS. GEDDES: They're in the 240 series.

15 THE COURT: I think we can get the witness and then  
16 we can get the jury and we will see how far we get.

17 (Jury enters.)

18 THE COURTROOM DEPUTY: You may be seated.

19 THE COURT: Okay, everybody, we are ready to  
20 continue. Do you want to call your next witness?

21 MS. GEDDES: Yes, the Government calls Alesiette  
22 Mayweather.

23 (Witness takes the stand.)

24 THE COURTROOM DEPUTY: Raise your right hand.

25 (Witness sworn/affirmed.)

Proceedings

3386

1 THE COURTROOM DEPUTY: Have a seat. Please state  
2 your name for the record.

3 THE WITNESS: Alesiette Mayweather.

4 (Continued on the next page.)  
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Mayweather - direct - Geddes

3387

1 **ALESIETTE MAYWEATHER,**

2 called by the Government, having been

3 first duly sworn, was examined and testified

4 as follows:

5 DIRECT EXAMINATION

6 BY MS. GEDDES:

7 THE COURT: Just a couple of things before you  
8 start, the microphone is on, isn't it? The key thing is want  
9 to be sure that everybody can hear you. Make sure you use the  
10 microphone. Don't speak too quickly. I want to be sure that  
11 the Court reporter can get down everything you say. If  
12 there's a question that isn't clear or you want it repeated,  
13 tell me and I will direct the lawyers to rephrase it. And do  
14 your best to just answer the question that you are being asked

15 Q Did you receive a subpoena to testify here today?

16 A I did.

17 Q Do you want to be here today?

18 A Absolutely not.

19 Q I am showing you what's in evidence as Government Exhibit

20 1. Do you recognize the individual shown in Government

21 Exhibit 1?

22 A I do.

23 Q Who is that?

24 A It's Robert.

25 Q Do you know him personally?

Mayweather - direct - Geddes

3388

1 A I do.

2 Q Do you see him in the courtroom today?

3 A I do.

4 Q Can you point to him and describe an article of his  
5 clothing?

6 A He has on a gray suit.

7 THE COURT: Indicating the defendant.

8 Q I want to direct your attention to 2015. What was your  
9 relationship to the defendant at that time?

10 A I was a friend.

11 Q Did you start -- go ahead.

12 A And then I later became an employee.

13 Q And what type of employee were you with the defendant?

14 A A personal assistant.

15 Q For how long were you a personal assistant for the  
16 defendant?

17 A Formally about eight months.

18 Q And do you recall when you formally became his personal  
19 assistant?

20 A Around December of that year.

21 Q Of 2015?

22 A Of 2015.

23 Q And do you recall when you stopped working as his  
24 personal assistant?

25 A Somewhere in June of 2016.

Mayweather - direct - Geddes

3389

1 Q And prior to formally starting to work for the defendant,  
2 did you accompany him on some bus trips while he was on tour?

3 A I did.

4 Q Do you have any siblings?

5 A I do.

6 Q How many?

7 A One.

8 Q How old is she compared to you?

9 A We're twins.

10 Q And do you have a nickname?

11 A Yes.

12 Q What is that?

13 A Twin.

14 Q Now you testified that you formally started working for  
15 the defendant at the end of 2015. When did you meet him,  
16 approximately?

17 A Sometime in the late '90s.

18 Q And how did you meet him?

19 A Through mutual friends.

20 Q Prior to being introduced to him through mutual friends,  
21 had you attended any R. Kelly concerts?

22 A I had, yes.

23 Q And would you consider yourself a fan?

24 A Yes.

25 Q Before you started to work for the defendant either on an

Mayweather - direct - Geddes

3390

1 informal or a formal basis, where did you see the defendant?

2 A Where did I see him?

3 Q Yes, just generally speaking where would you see the  
4 defendant?

5 A At shows, at parties.

6 Q And where did you attend parties?

7 A At his house or at the studio.

8 Q Where was he -- what house did you attend parties at?

9 A Olympia Fields.

10 Q Is that a suburb of Chicago?

11 A Yes.

12 Q And you testified that you also went to some parties at  
13 his studios; is that correct?

14 A Yeah, I did.

15 Q Or that you saw him at his studio?

16 A I saw him at his studio, yes.

17 Q Which studios do you recall seeing the defendant at?

18 A His studio in downtown Chicago and then of course the  
19 Justine studio.

20 Q And the second studio that you mentioned, was that a  
21 studio on Justine Street?

22 A Yes.

23 Q Also in Chicago?

24 A Yes.

25 Q Now, when you started to work for the defendant, what was

Mayweather - direct - Geddes

3391

1 your schedule?

2 A Two weeks on, two weeks off.

3 Q And when you were not -- when you were on a two-week  
4 break or you were on a two-week break not working, who was  
5 working and performing your job?

6 A My sister.

7 Q Your twin sister?

8 A My twin sister.

9 Q What were your responsibilities as a personal assistant  
10 for the defendant?

11 A Just basically taking care of his daily needs whether it  
12 was running errands or making sure he was awake for meetings  
13 when someone would come to the studio.

14 Q While you were working for the defendant did you  
15 accompany him on any tours?

16 A I did.

17 Q Which tour or tours did you go on?

18 A One was the Buffet tour and I think some other dates were  
19 just dates. I'm not sure if it was an actual tour.

20 Q So, in addition to accompanying the defendant on the  
21 Buffet tour did you also go to other cities where he was  
22 playing at these one-off concerts?

23 A I did, yes.

24 Q And when you were on tour with the defendant or going to  
25 other cities where he was performing, while you were working



Mayweather - direct - Geddes

3392

1 for minimum would you attend the concerts?

2 A Yes.

3 Q And what if any responsibilities did you have during  
4 those concerts?

5 A Just making sure his guests were seated where they needed  
6 to be seated or making sure he needed what he needed.

7 Q And what you're referring to -- in your last answer when  
8 you refer to guests, what type of guests are you referring to?

9 A Any guests that were invited to the show or his  
10 girlfriends.

11 Q I'm showing you what's in evidence as Government Exhibit  
12 75.

13 (Exhibit published.)

14 BY MS. GEDDES:

15 Q Without saying this individual's name, do you recognize  
16 her?

17 A Yes.

18 Q And do you know her first and last name?

19 A Yes.

20 Q And I am showing the jury only what's in evidence as 75A.

21 (Published to jury only.)

22 Q Is that -- is that that same photograph shown in  
23 Government Exhibit 75 with the true first and last name of  
24 that individual?

25 A Yes.

Mayweather - direct - Geddes

3393

1 Q For today we're going to call her Jane, okay?

2 A Okay.

3 Q Where did you first meet Jane?

4 A In New York.

5 Q And through whom did you meet Jane?

6 A Through Rob.

7 Q And what happened, where did you meet her?

8 A At would have been of his shows at the Barclay, but  
9 initially it was he and my sister were on a FaceTime call.

10 Q And were you with your sister when she was on a face time  
11 call with the defendant?

12 A I was, yes.

13 Q And during that call, did you see Jane on the other end  
14 of the FaceTime call?

15 A Yes.

16 Q And then subsequently you saw her when you were in New  
17 York for the concert at the Barclays; is that correct?

18 A Yes.

19 Q What if any nicknames did you and your sister use for  
20 Jane?

21 A We called her Niece.

22 Q And do you recall how the defendant introduced you or --  
23 you and your sister to Jane?

24 A I don't know how he introduced me but he introduced my  
25 sister.

Mayweather - direct - Geddes

3394

1 Q Were you present for that conversation?

2 MR. CANNICK: Objection.

3 THE COURT: Overruled.

4 BY MS. GEDDES:

5 Q I want to direct your attention tension to September 25  
6 of 2018. Do you recall where you were that day?

7 A No.

8 Q I'm showing the defendant what's been marked for  
9 identification as 540K and I'm going to direct your attention  
10 to where my pen is pointed. Can you read that?

11 A It says, Okay --

12 Q Does it refresh your recollection as to where you were?

13 A Yes, yes.

14 Q Where were you?

15 A In New York.

16 THE COURT: Are these in evidence?

17 MS. GEDDES: This is not. This was just to refresh  
18 her recollection.

19 BY MS. GEDDES:

20 Q And why were you in New York?

21 A For Rob's concert.

22 Q And was that the concert at the Barclays?

23 A Yes.

24 Q Where did you go after the concert -- do you know where  
25 the Barclays is?

Mayweather - direct - Geddes

3395

1 A Yes.

2 Q Where is it?

3 A In Brooklyn.

4 Q Here in Brooklyn, New York?

5 A Yes.

6 Q And did you -- where did you go after Brooklyn? Did you  
7 continue to travel -- did you go somewhere else with the  
8 defendant?

9 A Yes.

10 Q Where did you go?

11 A From New York to D.C.

12 Q And how did you travel between New York and D.C.?

13 A On the Sprinter.

14 Q And how about your sister? I -- you testified earlier  
15 that you -- was your sister in Brooklyn with you?

16 A Yes.

17 Q And did she travel to D.C. with you?

18 A No.

19 Q What did she do?

20 A She went back to the airport.

21 Q And did you then meet her in D.C.?

22 A Yes.

23 Q Or did she return to D.C..

24 How did you get from New York to D.C.?

25 A On a Sprinter.

Mayweather - direct - Geddes

3396

1 Q Whose Sprinter?

2 A Rob's Sprinter.

3 Q Who if anyone else was on the Sprinter with you from that  
4 trip between New York and D.C.?

5 A Jane, and Rob was on and off.

6 Q The defendant was on and off during the trip between New  
7 York and D.C.; is that correct?

8 A Correct.

9 Q What, if anything, did you observe about Jane during that  
10 trip?

11 A She slept most of the trip.

12 Q Did she get off the Sprinter van? Did you answer or are  
13 you thinking?

14 A I'm thinking. Only when we made one particular stop that  
15 I recall.

16 Q And which stop are you recalling, where did you stop?

17 A I think it was a Best Buy.

18 Q And did do you recall why you were at the Best Buy?

19 A To purchase a computer.

20 Q For whom?

21 A For Jane.

22 Q And who purchased the computer for Jane? Who paid for  
23 that?

24 A I believe Robert did.

25 Q And by the way when you said that the defendant was on

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1 and off the Sprinter van, what do you mean by that?

2 A He, well part of the way on the Sprinter and then he  
3 would get on the tour bus. He got on the tour bus at some  
4 point.

5 Q What, if anything, did you hear Jane call the defendant  
6 during that trip?

7 A Daddy.

8 Q Once you arrived in D.C., what did you do?

9 A Checked into a hotel and then I flew out the next  
10 morning.

11 Q And do you recall why you were in D.C.?

12 A I believe he had a show.

13 Q In D.C.?

14 A Yes.

15 Q And you then returned to Los Angeles; is that correct?

16 A Correct.

17 Q Were you living in Los Angeles at that time?

18 A Yes.

19 Q Now, when you started to -- at the time when you traveled  
20 with Jane from New York to D.C., were you formally working for  
21 the defendant at that time?

22 A No.

23 Q But you did later start to formally work for him; is that  
24 correct?

25 A Correct.

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1 Q When you did start to formally work for him, were there  
2 females who were effectively living with the defendant?

3 A Yes.

4 Q And was Jane one of those females?

5 A Yes.

6 Q I'm showing you what's in evidence as Government Exhibit  
7 69B?

8 (Exhibit published.)

9 Q Do you recognize that individual?

10 A Yes.

11 Q What is her first name only?

12 A Dominique.

13 Q And do you know her true first and last name without  
14 saying it?

15 A Yes.

16 Q Was Dominique one of the females effectively living with  
17 the defendant when you started to formally work for him?

18 A Yes.

19 Q I'm showing you what's in evidence as Government Exhibit  
20 52B?

21 (Exhibit published.)

22 Q Do you recognize that individual?

23 A Yes.

24 Q Without saying it do you know her true first and last  
25 name?

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1 A Yes.

2 Q Do you also know a nickname for her?

3 A Yes.

4 Q What is her nickname?

5 A Juice.

6 Q And when you started to formally work for the defendant,  
7 was Juice one of the females who were effectively living with  
8 him?

9 A Yes.

10 MS. GEDDES: I'm showing the witness what's in  
11 evidence as Government Exhibit 72.

12 (Exhibit published.)

13 Q Do you recognize the individual shown in Government  
14 Exhibit 72?

15 A Yes.

16 Q And do you know her true first and last name?

17 A Yes.

18 Q And do you also know a nickname for her?

19 A Yes.

20 Q What is her nickname?

21 A Vee.

22 Q And was Vee one of the females who was effectively living  
23 with the defendant when you started to work for him formally?

24 A Yes.

25 Q And I'm showing you what's in evidence as Government



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1 Exhibit 78?

2 (Exhibit published.)

3 Q Do you recognize that individual?

4 A Yes.

5 Q And without saying it, do you know her first and last  
6 name?

7 A Yes.

8 Q What is her first name?

9 A Jocelyn.

10 Q During the period that you were working for the  
11 defendant, what was her relationship with the defendant?

12 A A girlfriend.

13 Q Was she living with him at the time that you worked for  
14 the defendant?

15 A Not immediately, no.

16 Q And during any point during the eight-month period that  
17 you were formally working for the defendant, was she  
18 effectively living with the defendant?

19 A She was transitioning in at the end when I was leaving,  
20 right before I left.

21 Q And when you say transitioning, what do you mean?

22 A She was moving in, I guess, I would say.

23 Q And prior to that time, what was her relationship with  
24 the defendant?

25 A She was the girlfriend who would fly in and out to visit.

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1 Q And did you sometimes arrange her travel to see the  
2 defendant?

3 A Yes.

4 Q Now, what if any rules did the defendant tell you about  
5 during your employment with him?

6 A Just one was to knock before entering rooms and then not  
7 to talk to any guys around his girlfriends.

8 Q Now, from the time that you first met the defendant in,  
9 did you say, the late '90s?

10 A Yes.

11 Q Until you started to formally work for him, had you met  
12 some of the men who worked for an associated with the  
13 defendant?

14 A Yes.

15 Q And had you become friendly with them?

16 A Yes.

17 Q And when the defendant told you that he didn't want you  
18 to interact with those individuals, what did you understand  
19 him to mean?

20 A Only not to interact with them around his girlfriends.

21 Q So it's fair to say that you were free under the  
22 defendant's rule to interact with them as long as the  
23 defendant's girlfriends were not present?

24 A Yes.

25 Q Did you interact with any of the defendants girlfriends

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1 by telephone?

2 A Yes.

3 Q Who did you interact with?

4 A Juice.

5 Q Did you have an opportunity other than Jane to hear how  
6 the defendant's girlfriends referred to the defendant in his  
7 presence?

8 A Yes.

9 Q What did they call him?

10 A Daddy.

11 Q All of them?

12 A Yes.

13 Q How did the defendant's female guests and live-in  
14 girlfriends refer to the defendant when they were talking  
15 about him to you?

16 A Mr. Kelly.

17 Q And would all of them do that?

18 A Yes.

19 Q I'm showing you what is --

20 MS. GEDDES: Well, the Government offers 240U. I  
21 think this is one that there is no objection to.

22 THE COURT: All right.

23 No objection; right, Counsel?

24 MR. CANNICK: No.

25 THE COURT: That is in evidence.

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1 (Government Exhibit 240U received in evidence.)

2 BY MS. GEDDES:

3 Q Now, are these text messages that you sent on September  
4 27 of 2015?

5 A Yes.

6 Q Are these messages that you exchanged with your twin  
7 sister?

8 A Yes.

9 Q And in the column marked Name, does that indicate your  
10 twin sister and her telephone number?

11 A Yes.

12 Q And we're going to cover up her telephone number so it  
13 can be published to the jury or to the public.

14 (Exhibit published.)

15 Q In the first text where it says: She says yes, sir, no,  
16 sir to him. He makes them respect him. Do you recall who you  
17 were referring to, the "she"?

18 A Jane.

19 Q And who was the "he" in that sentence?

20 A Rob.

21 Q And then continuing on you say: And Daddy. So I figured  
22 that's why he told her we are her aunties because we are his  
23 sisters. Who is the "her" in that sentence?

24 A Jane.

25 Q And the "his"?

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1 A Rob.

2 THE COURT: Is this a good time to break? I think  
3 I've got us right to 6 o'clock.

4 MS. GEDDES: Sure.

5 THE COURT: So the witness can step out. We will  
6 see you tomorrow.

7 (Witness steps down.)

8 THE COURT: Ladies and gentlemen we are going to  
9 break for tonight. I will see you tomorrow morning, same  
10 time. Don't talk about the case in any way, shape or form.  
11 Don't look anything up about the case, don't listen to any  
12 reports about it or read anything about it or anything like  
13 that. Do have a good night. I will see you tomorrow morning.  
14 Thank you so much.

15 THE COURTROOM DEPUTY: All rise.

16 (Jury exits.)

17 THE COURT: Everybody can have a seat.

18 Is there anything that we have to do before we break  
19 for the day?

20 MR. CANNICK: Nothing from us, Your Honor.

21 THE COURT: Okay.

22 MS. GEDDES: Can we just address one issue at  
23 sidebar?

24 THE COURT: The reporter isn't needed for this?

25 MS. GEDDES: No, Your Honor. It's just for

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1 scheduling purposes.

2 THE COURT: Okay. Thank you.

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5 (Matter adjourned until September 14, 2021 at 9:30 a.m.)

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I N D E XWITNESSPAGE

DIANA COPELAND, Continued

DIRECT EXAMINATION BY MS. GEDDES	3187
CROSS-EXAMINATION BY MR. CANNICK	3202
CROSS-EXAMINATION (CONTINUED)	3215
REDIRECT EXAMINATION BY MS. GEDDES	3248
RECROSS EXAMINATION BY MR. CANNICK	3258

ANGELA

DIRECT EXAMINATION BY MS. SHIHATA	3270
CROSS-EXAMINATION BY MR. CANNICK	3310
REDIRECT EXAMINATION BY MS. SHIHATA	3315

ALEX

DIRECT EXAMINATION BY BY MS. SHIHATA	3323
CROSS-EXAMINATION BY MR. CANNICK	3369
REDIRECT EXAMINATION BY MS. SHIHATA	3381
RECROSS-EXAMINATION BY MR. CANNICK	3382

ALESIETTE MAYWEATHER

DIRECT EXAMINATION BY MS. GEDDES	3387
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E X H I B I T S

Government Exhibit 301 3196

Government Exhibit 3500-DC2-8 3199

Government Exhibit 970 3202

Government's Exhibit 82 3271

Government's Exhibit 82(a) 3271

Government's Exhibit 82(b) 3272

Government's Exhibit 92 3280

Government Exhibit 964 3294

Government's Exhibit 68A 3324

Government's Exhibit 68B 3324

Government's Exhibit 969 3335

Government Exhibit 240U 3403

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